

Faculty of Education, QUT
Submission to the
National Review of Teacher Registration Consultation paper
May 2018

The Faculty of Education, QUT, welcomes the opportunity to provide input into the consultation process to the National Review of Teacher Registration agreed to by the State, Territory and Commonwealth Education Ministers.

The Faculty of Education is a national leader in teacher education and in many areas of education research. We offer a comprehensive range of undergraduate and postgraduate Education specialist programs in early childhood, primary and secondary and we design and deliver customised Education capacity building programs, locally and internationally. The Faculty of Education holds an international reputation for its exceptional education specialist programs and is one of the largest pre-service teacher education providers in Australia.

Summary of Key Points

The Faculty of Education is supportive of the current national teacher registration framework and the existing opportunities for suitably qualified teachers working in different contexts being able to access teacher registration in an equitable manner. The consideration of a national approach to teacher registration could benefit teachers who work between states, which currently require multiple teacher registration memberships in different states. We support the Australian Early Childhood Teacher Education Network's (AECTEN) position that the inclusion of early childhood teachers in national registration has great potential to support teacher quality and professional status in prior to school settings. The Faculty supports the recommendation of pre-registration of ITE students, if the intention is focussed on child safety and implemented with no financial cost to the student. If the intention of pre-registration is focussed on a pathway to early employment, the Faculty asks that the review panel carefully consider the implications of this approach in the context of ITE reform with a focus on quality teaching. Along with its broader remit, the National Review of Teacher Registration is charged with considering the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse that relate to teacher registration. The Faculty has included reference to the recommendations that address how registered teachers might satisfy the *fit and proper person* requirement.

The Faculty offers the following comments on the key considerations within the scope of the review, and potential areas for improvement:

How is the national teacher registration framework working across Australia?

The Faculty works closely with the local regulatory authority, the Queensland College of Teachers, to manage the transition to full registration for a small number of staff. This has been a rigorous and supportive process which ensures staff with teaching degrees, who have moved states or countries

and are employed in a different context are able to access teacher registration in an equitable way. The Faculty deems the eight elements of the 2011 Framework are relevant and appropriate and we believe these have been effective in supporting a rigorous approach to ensuring high standards are applied to those entering the teaching profession in Australia. A nationally consistent approach could benefit teachers financially where they hold multiple teacher registration memberships. For example, a teacher who holds teacher registration in Western Australia can apply for mutual recognition in Queensland, but is then required to pay for both states to maintain that membership. A further complexity involves two different criminal checks required, for example a Working with Children Check in Western Australia and a Blue Card in Queensland. This example can also be applied to working across other states where borders are geographically convenient.

Should early childhood teachers be part of a national approach to teacher registration?

The Faculty would support the inclusion of early childhood teachers working in approved Early Childhood Education and Care (ECEC) services prior to school, with birth to school entry, in a national approach to teacher registration. We support the Australian Early Childhood Teacher Education Network's (AECTEN) position that such an approach has great potential to support teacher quality and professional status.

This consideration raises an important question in relation to how the movement towards an inclusive national teacher registration system is supported, recognising a number of sector specific challenges. To enable a national approach, there is need for a more inclusive version of the Australian Professional Teacher Standards that speaks to the work of qualified teachers working in a range of education contexts. Consideration will also need to be given to supervision and mentoring of early childhood teachers in prior to school settings, and equitable access to quality professional development, to support them to move from provisional to full registration, and to maintain registration.

While recognising jurisdictional differences, we note that early childhood teachers can already be registered and move from provisional to full registration in preschool/kindergarten programs (in standalone preschool services and long day care) and in schools in most states and territories, with some states (e.g. WA) enabling teacher registration for early childhood teachers working with younger children in ECEC. There is potential to learn from the experience of states that have an inclusive approach to teacher registration.

We would also note, in terms of progressing this consideration, that there has been limited consultation on the question of early childhood teacher registration. While we applaud this approach to recognise and support the professionalism of early childhood teachers working in prior to school education contexts, there is also a clear risk in that it could lead to a split system of teacher registration or maintaining the status quo because it is perceived as too difficult to move forward. For this reason, we would support AECTEN's position regarding an in-principle agreement to an inclusive national approach to teacher registration that extends registration to early childhood teachers working in prior to school ECEC settings; and a commitment for further targeted consultation with ECEC stakeholders to identify challenges and explore options to support implementation in the prior to school sector.

How does teacher registration support entry into the teaching profession?

The Faculty supports the recommendation of pre-registration of ITE students, if the intention is focussed on child safety and implemented with no financial cost to the student. The inclusion of a streamlined approach to providing a criminal check within the same application process is also recommended. This approach may enable regulatory authorities to track an ITE students' conduct through their engagement in professional experiences in schools/sites whilst in their pre-service teacher phase. For example, if a pre-service teacher behaves inappropriately while in a school/site and is disciplined within the university system, then proceeds through the ITE course to graduation and employment, there is currently no tracking of this conduct for future reference if similar behaviour is encountered when in provisional or full registration. While the pre-service stage is the foundation of a teachers' career and the opportunity to learn from mistakes should not be discouraged, the ethical conduct within that period can provide an insight into the eligibility of a teacher that is critical for child safety. It might also provide an opportunity for the regulatory authority to consider how misdemeanours might be managed through the same rigorous investigation and disciplinary procedures as provisional and fully registered teachers.

If the intention of pre-registration is focussed on a pathway to early employment, the Faculty does not support this approach and would ask that the review panel carefully consider the implications of this approach in the context of ITE reform with a focus on quality teaching. Often, it is our difficult to staff schools situated in rural, remote or Indigenous communities that are challenged with attraction and retention of quality teachers. The teaching profession must maintain its approach to quality teaching and this new category of pre-registration should not result in an opportunity for poorly paid, poorly prepared teachers going into areas where quality teaching is imperative. The current approach for early employment offered through a distinct category of registration, either Permission to Teach or Limited Authority to Teach, depending on the regulatory authority and the state in which the teaching shortage occurs, is already addressing these areas. The Faculty would be very concerned if the pre-registration phase of ITE students is linked to any early employability agenda, as this would be a divergence from the current emphasis on preparing classroom ready graduates through rigorous accreditation of our courses, including the requirement for final year ITE students to provide evidence of impact through the Teaching Performance Assessment.

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

Along with its broader remit, the National Review of Teacher Registration is charged with considering the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse that relate to teacher registration. The Royal Commission Recommendations that relate to the question of "*How can we ensure that registered teachers satisfy the fit and proper person requirement?*" include:

Recommendations 6.4-6.14 which refer to the implementation of 10 Child Safe Standards. Legislated Child Safe Standards, if enacted, would form a regulatory mechanism by which to require that all institutions that engage in child-related work to meet these Child Safe Standards. The Child Safe Standards were developed by the Royal Commission (a QUT researcher, Professor Kerryann Walsh, led the background research into this) and were tested in a Delphi study conducted in 2016 (which was designed by Prof Walsh, but conducted independently). Following the study, the

Standards were revised, and offered for consultation with industry (including the early childhood education and care and school education sectors) and community groups. Since late 2017, the National Children's Commissioner has been consulting on a set of Principles for Child Safe Organisations which exactly mirror the Royal Commission's proposed Child Safe Standards.

If the Federal Government decides to introduce Child Safe Standards, this will provide another framework against which AITSL will need to map the Professional Standards for Teachers, and perhaps create additional indicators.

Of particular interest to the National Review of Teacher Registration will be Child Safe Standard 5 which was included to ensure that people working with children and young people are suitable and supported. However, as will be explained below, this is not the only Standard that should be of interest to the Review.

Recommendations in Volume 13 (Recommendations 13.1-13.8) that pertain to Schools also contain further recommendations with implications for teacher registration, namely:

- State and Territory independent oversight bodies for the Child Safe Standards to delegate responsibility for monitoring and enforcing Child Safe Standards to school registration authorities (Rec 13.2).
- School registration authorities should place particular emphasis on monitoring boarding schools. (Rec 13.3)
- Boarding hostels should implement the Child Safe Standards (Rec 13.5)
- Guidance for teachers and principals: State and Territory governments should provide nationally consistent, easily accessible guidance to teachers and principals in preventing and responding to child sexual abuse in government and non-government schools. (Rec 13.7)
- Teacher registration: COAG should consider strengthening teacher registration requirements to better protect children from sexual abuse in schools. In particular, COAG should review minimum national requirements for assessing the suitability of teachers and conducting disciplinary investigations (Rec 13.8).

This suggests that in addition to processing information to determine if individual applicants for registration and registration renewal are fit and proper persons, teacher registration bodies would also be delegated responsibility for monitoring and oversight of jurisdictional Child Safe Standards. This would include all Child Safe Standards, not only the specific standard that applies to ensuring people working with children are suitable and supported (Child Safe Standard 5).

A model exists for the effective implementation of Child Safe Standards – Victoria has been successfully doing this including in schools since August 2016. The model provided by Victoria includes comprehensive guidance, and education and training materials (see <http://www.education.vic.gov.au/about/programs/health/protect/Pages/default.aspx?Redirect=1>). The Royal Commission looked favourably upon this model and representatives who attended community consultation round tables provided detailed information about their experience of implementation.

Additionally, the Royal Commission commissioned a comprehensive analysis of oversight and regulatory systems that should be examined in detail by the National Review of Teacher

Registration. This was conducted by QUT Law Professor Ben Mathews. In particular, pp.25-27 summarises the optimal approach. This document is available at <https://www.childabuseroyalcommission.gov.au/sites/default/files/file-list/Research%20Report%20-%20Oversight%20and%20regulatory%20mechanisms%20aimed%20at%20protecting%20children%20-%20Government%20responses.pdf> .

The Faculty of Education appreciates the opportunity to provide this submission.