Response to the report

QUALITY MATTERS.
Revitalising teaching: Critical times, critical choices

prepared by

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Response to the report *Quality Matters*

**General Comments**

The Anglican Education Commission congratulates the Review on the bold initiatives it has recommended to improve the supply, quality and professional practice and status of teachers in New South Wales. The Commission is in broad agreement with the policy directions and recommendations suggested by the Review. However, it believes there are a number of matters that deserve further consideration.

**NSW Government-led reforms:**

In a number of respects, this Report does not address as fully as it should the problems that a government-led reform for a self-regulating profession will educe. Firstly, the desire for increasing mobility into and out of the profession carries with it the issue of those who qualify under other education systems. The assumption that NSW can lead such reforms with the other states falling into line is dubious. The Commission believes that a negotiated approach between state and territory governments would be more effective.

Secondly, there are numerous recommendations that impact on Commonwealth-State relations. Teacher supply has as much to do with Commonwealth funding for universities as it does about the allocation of resources within any university and the extent of cross-subsidisation of one course by another. Teacher training courses already suffer from being low cost in the theoretical studies in education but high cost when it comes to practical experience, prompting university administrators to favour the former over the latter. It is noted that the latter is an area the Report proposes to expand and improve. In the context of static Commonwealth allocations, universities have been trimming back the costs associated with practical experience, in order to maintain staffing levels in Education faculties and the range of expertise they provide. The Commission is not sure that a unilateral reform by the NSW Government of the proposed type is feasible under the present funding regime. It is unlikely that the NSW Government would commit the resources to the reforms mooted in this Report, unless the Commonwealth and other state and territory governments can also be persuaded to do the same. There are no recommendations as to how this might be achieved.

Thirdly, in any consideration of these matters, it must be recognised that, although universities are the main providers of teacher education and development programs, they are not the only ones.

**Status of teaching:**

There appears to be broad community agreement that the status and remuneration of teachers lags behind that of many other professions and that this is not in the best interest of attracting and retaining high quality teachers. Quality teachers are widely recognised as essential for ensuring the broadest range of opportunities in life for Australian children. Yet, this does not appear to be matched by a community commitment to resourcing either the improvement of teaching standards or the remuneration of teachers to bring them more in line with other professionals. It is noted that in the past the major cost of improvements has generally been carried by teachers themselves (in the form of paying for any significant forms of professional development themselves) at a time when their salaries have been in relative decline. This is clearly out of step with the financial and other assistance given to professionals employed in
other industries. Furthermore, although starting salaries are comparable, teachers are soon left behind as the income earning potential of most other professionals. Since the recommendations contained in *Quality Matters* entail significant costs for both the schools and the tertiary education sector in order to improve the quality and status of teachers, it is important that Commonwealth and State governments provide the resources necessary to achieve these objectives.

**Self-regulation of the profession:**

The Anglican Education Commission agrees in principle with the recommendations about self-regulation, however there are serious shortcomings in the Report because it fails to address a number of important issues. Firstly, it makes no recommendation about ensuring that the interests of teachers from all school sectors are represented. Too often wrong assumptions are made about who might represent whom to the detriment of teachers and schools in the independent non-government sector.

Secondly, because of the past history of linking status with employment conditions, there is the possibility of the self-regulatory body becoming politicised as it focuses on lifting the status of the profession. Self-regulation also carries with it the real danger of self-serving activities that are designed to protect those already within a profession from undue competition from others. The medical profession’s unwillingness to recognise certain overseas qualifications and experience is a case in point. In a profession that is already divided on ideological grounds over public funding for private schools, the danger of politicisation of the regulatory body and the exclusion of some who do not subscribe to the majority view on certain matters is a distinct possibility.

Thirdly, there are clear differences in philosophy between the sectors over the question of what are the goals of schooling and how are they to be achieved. This has not been noted by the Report nor taken into account in the recommendations. The ramifications for setting standards for the profession are significant and must be addressed, both in terms of the membership of the governors of the Institute and in the processes for endorsing programs.

**Globalisation:**

The problems faced by a State government in working against the prevailing ethos at a national level are likely to be much less than the problems globalisation will present. The use of ICT-delivered courses by transnational education providers will expand the opportunities for intending teachers to select from among many initial teacher education and professional development courses. Already, many English universities have overseas campuses for the delivery of courses in educational management and leadership. If the Report is to be the blueprint for the start of the twenty-first century, this aspect must be taken into consideration in any measures that may be taken by Government.

**Composite accreditation:**

In view of much of the above, it is likely that numbers of intending teachers will present with composite accreditation from a number of sources. Any procedures will need to be flexible enough to deal with this trend so that procedural fairness and natural justice will be afforded all applicants for the various levels of teaching accreditation through the proposed Institute.

**Disaccreditation:**

The Anglican Education Commission strongly supports the view that any process for the disaccreditation must have suitable appeals mechanisms, especially if unethical behaviour, incapacity or inefficiency are made grounds for disaccreditation.
**Code of ethics:**

The above comments on the differences between sectors about the philosophy of education would also apply to the development of a code of ethics. The inability of educators to reach agreement in the area of moral education has the potential to hinder the development of a code of ethics that rises above banal ‘motherhood’ statements.

**Initial teacher education:**

The discussion seems to imply that a choice is being made to give more prominence to professional practice than to academic achievement in the content knowledge of particular disciplines. If this is the intention, then the Anglican Education Commission would argue for high standards in both areas. The Commission appreciates and supports the arguments for early experience of teaching in these programs and for clear pathways out of teaching into other professions. For more advanced students there is a question of natural justice if, towards the end of their course, they find that they have not developed to the standard required for accreditation. In addition to supervision and mentoring, there is the need for remediation in areas of weakness. For those leaving initial teacher education programs because of their lack of development of the requisite personal qualities and skills, appropriate counselling and careers advice should be made available.

With respect to initial teacher education programs, there is a question of critical mass – both in terms of lecturing staff and students within the course - to enable students to have a learning experience that is broad and deep enough to equip them properly. The Commission notes that some universities have permitted their Education faculties to decline to the point where it is questionable whether they do have the critical mass required to fulfil these criteria. Consideration should be given to whether these universities can be encouraged to form partnerships with others to overcome such difficulties.

The same considerations apply to programs conducted by non-university providers of teacher education. Often these serve specialist needs or are based on a particular educational philosophy. It is clear that public universities are not always able to serve these sections of the educational community. Nevertheless, consideration should be given to encouraging these independent providers to enter formal association with universities for quality assurance purposes and to ensure that their graduates have a qualification that has wide acceptance and is portable across all sectors of the teaching profession and beyond. The English model of university validation of such courses and the granting of academic awards by the validating university could be adopted.

**Standards for continuing teacher education:**

The Commission welcomes the emphasis on individual improvement. It is important that any accreditation system recognises individual differences and giftedness among practising teachers and that the APT-2 classification is open to teachers with a wide range of specific professional expertise. As already mentioned, the Commission does not favour a uniform approach based on a lowest common denominator. It is of concern how the processes and procedures for endorsement may adversely impact on courses designed for small numbers of students that are less well resourced because of detailed compliance requirements. Presumably there will be a cost involved in applying for and gaining endorsement. The question is whether the individual provider bears this cost or whether it is borne by the accrediting agency. This has implications for independent specialist course providers.
Differentiation of skills required by school leaders:

The Report is not specific about the types of skills needed and programs that would develop teachers for leadership positions. The increasing size of schools and the complexity of demands made on school leaders has led to a differentiation of roles at a senior level. Each of these requires certain generic and various specific skills, depending on the type of school. It is to be hoped that, as with APT-2, the APT-3 professional activities will be broad enough to embrace the preparatory programs and activities that are specific to the needs of particular schools. The Anglican Education Commission is opposed to a one-size-fits-all approach to these matters.

Accreditation of schools:

The Commission questions the Report’s emphasis on reconnecting teacher education with schools. It seems to imply that they are not connected at present though they were at some time in the past. Although this might be true in some instances, many universities have good connections with schools and have worked hard to forge and service these links. For example, the University of Western Sydney has strong connections with the schools that provide professional experience for trainee teachers, a comprehensive handbook, detailed assessment criteria to be used in evaluating the aptitude of trainee teachers, and joint projects with schools to develop school-based teaching and learning.

However, the Commission believes it is not in the best interests of the profession that initial teacher education become entirely a school-based program. Although the Professional Development School model, developed in the United States has worked well in the limited number of states in which it has been tried, the cost of implementation across the whole profession in New South Wales would be prohibitive. Nevertheless, elements of it, such as the close connection between universities and schools, school-based research and development, the involvement of the whole school staff in induction and professional development, and the climate of the school being an active learning community, are worthy of adoption and support at every level in New South Wales.

Accreditation of schools raises a number of issues. Among them is the variability of expertise and professional practice between subject departments in secondary schools. Many high quality schools have areas of weakness. In the Commission’s view, high quality professional experience is more likely to arise from accreditation of individual subject departments or learning areas. A cumbersome but more helpful system for teacher trainees would be a rating system where infants and primary schools and subject departments/learning areas were ranked on a five-point scale (in the same way that British university departments are). The incentive is given to schools to improve their ranking and to become the training ground for new teachers. If a level of funding also flows to those that have high ranking and are eagerly sought after by trainee teachers, schools will be encouraged to concentrate on pedagogical improvement.

Another and related issue is the level of training given to master teachers who will supervise the professional experience of trainee teachers in schools. There are grounds for building this into the requirements of APT-1 teachers seeking to advance o APT-2. Only in exceptional circumstances should a GTA have supervision of the professional experience of a trainee teacher.

Australian Graduate School of Teaching:

The arguments for such a body are cogently presented. The Commission questions whether the apppellative ‘Australian’ is appropriate for a NSW initiative. On the other hand, it would be worthwhile pursuing a truly national body through negotiation with other states and
territories. The use of the analogy of the Australian Graduate School of Management is not particularly appropriate because of the significant differences in philosophy, approach and intended outcomes between teacher and management education.

**Quality teacher supply:**

The Commission is broadly supportive of the Report’s directions. There are two major areas of concern: the relative lack of success of central planning; and the difficulties posed by Commonwealth-state relations. These are discussed in relation to the specific Recommendations and Policy Directions (below).

**Teacher induction:**

The Commission is in agreement with the Report over the importance of teacher induction for a successful teaching career. The comments on defined roles, employer responsibilities, the focus on pedagogy and accreditation for induction professionals are apposite.

The Department of Education and Training has in recent years attempted to deal with a number of these issues. Independent schools and those in non-government systems also have developed induction programs.

One dimension needs careful consideration. For the proper functioning of schools, there will always need to be a reservoir of casual teachers available to meet short-term vacancies. This implies that there will always need to be an oversupply of trained teachers. It is therefore naïve to assume that all graduating teachers will proceed to full-time teaching. For some, it will be years before they take up a full-time position. These people generally suffer from inadequate or fragmented induction and loss of currency in the area of their training if they are required to fill vacancies on an ad hoc basis. Furthermore, for those who are required to teach in one school after another, or even a number of schools within the same teaching cycle, there is little chance to demonstrate some of the competencies in the Competency Framework for Beginning Teaching which require prolonged work with the same group of children.

Further consideration needs to be given as to how this situation might be addressed so these teachers are not disadvantaged.

It is noted, however, that Recommendation 14 does not address the question of accreditation of experienced teachers and educational leaders for induction purposes. Is it to be assumed that the Institute will address this? In the light of its importance, the question remains, if the Institute does not materialise, who or what body will have the carriage of this important matter?

**Information and Communication Technology:**

The Commission agrees that this continues to be an important dimension that must be considered if students are to have an integrated understanding of the role of ICT in most areas of human endeavour. Perhaps the report could have made more of the notion of having an ICT-literate culture in schools together with recommendations on how such a culture might be developed and sustained.

**Behaviour management:**

The Commission is fully supportive of the position taken by the Report.
Evaluation:

Past inaction in response to such matters demonstrates the need for ongoing evaluation of the implementation and outcomes of the recommendations of this Report.

Tendering:

Criticisms have been made of the concept of tendering with respect to the provision of teacher education. The Commission concedes that there might be some cost efficiencies from this, but other factors need to be taken into account. The danger is that competitive tendering will cause institutions to place bids at unsustainably low levels, thereby compromising the integrity and quality of all teacher education programs. Another potential problem, without some ranking of these programs for effectiveness and quality of outcomes, will be that dissimilar offerings will be treated as having equal capacity to prepare teachers or contribute to their professional development. When the tendering decisions are made by bureaucrats who are not trained educators, this problem is compounded even further.

As a result, the Commission recommends that safeguards be adopted if tendering is to be introduced.

Innovation:

The absence of explicit recommendations that will promote innovative pedagogy must raise the question of whether the implicit will be lost in the number of other matters that require to be addressed.

Conclusion:

The Commission is appreciative of the Report’s emphasis on the need for action in the face of previous inaction. Also it supports the view that these matters are of longstanding importance and complexity. It notes that the Report does not advocate teacher registration of the kind found in Queensland, New Zealand and Scotland, but draws on the National Board for Professional Teaching Standards in the United States. The reasons for adopting this position will be acceptable to some, but not all, Anglican educators.

The recommendations of the Report have the potential for increasing the cost of schooling in New South Wales. In particular, the additional remuneration needed to encourage teachers to seek the APT-2 and APT-3 classification, and the cost of professional experience and teacher induction will require additional funding by government. This has far-reaching implications for Commonwealth-State relations. The possibility of one state introducing such far-reaching reforms without the agreement and support of other governments also seems remote. In the context of the present under-resourcing of public schooling and education faculties in universities, and the lack of a public policy decision-making body to which all school sectors have access, many of the worthwhile reforms recommended by the Report may be jeopardised.

The Commission urges the Review to take these matters into consideration in reporting to the NSW Minister for Education and Training.
Comments on specific Recommendations and Policy Directions

The Anglican Education Commission is generally supportive of the Report’s recommendations. Disagreement is noted in the discussion of the individual recommendation. The following observations are considered pertinent.

**Recommendation 1:**
Given that not all teachers who teach in New South Wales were trained in this state, nor do all undertake their continuing professional development here, there is the need to think through the implications of this for any standards and accreditation framework. This problem is compounded by the contrasting nomenclature and possible lack of comparability with respect to overseas qualifications.

This recommendation also carries with it the implication that all school sectors will be represented in the governance of the Institute so that their needs, particularly with respect to teacher performance, quality and ethical standards will be met.

There is also the presumption that the Institute will be fully apprised of research, trends, policies and changes in other states and territories, as well as relevant overseas studies and activities.

**Recommendation 2:**
It is presumed that a set of minimum standards is in view. The requirement that they be ‘simple’ and ‘accessible’ is ambiguous. The determination of requirements for maintenance of accreditation has the greatest potential for industrial unrest.

**Recommendation 3:**
The reference to ‘practising’ is noted. It would seem wise to adopt something akin to the New Zealand requirement that a teacher has to demonstrate that he or she has been practising for so much (specified minimum) of the past (defined) number of years. In the interests of procedural fairness, it is presumed the Institute will need to ensure that there is consistency of scope and depth of expertise across specialisations within those that count towards the Accredited Practising Teacher 2 classification.

**Recommendations 4, 5 & 6:**
For these recommendations to succeed it will be necessary to have an evaluative framework with which to assess overseas and interstate courses and professional experience. For the greatest effectiveness, it would also appear necessary to develop some type of rating system for courses in teacher education programs and for the professional experience offered by schools and their individual departments. This is a complex and expensive, though not impossible, task.

There is no indication of the size of the Institute or of the representation on it. In the Commission’s view, it is imperative that each sector is given a voice. This may mean a large governing body, which in turn has implications for its workability.

The accreditation of existing teachers is clearly an important, and possibly time consuming, dimension to these recommendations. The Report is silent on this. Given that there are practising teachers in New South Wales who do not fit the Department of Education and
Training’s criteria for employment, there will need to be careful examination of how the accreditation of existing teachers is to be effected and over what time frame.

Another implication of these recommendations is that there will need to be negotiated reciprocal arrangements with other states and territories. This raises the question of whether there should be an Australian system, managed by each of the states. The Commission is of the view that this would be preferable to ensure the portability of accreditation between states and territories.

**Recommendation 7:**

Mention has already been made of the Commission’s view that it is pretentious to claim that a state-initiated School of Teaching is a national one. This is not to say that the concept does not have a great deal of potential and value.

**Recommendations 8 to 11:**

The Commission is fully supportive of the proposed Committee. The disparity between providers’ and governments’ estimates of future requirements has tended to distract from the task of addressing issues and has led to shortfalls in some areas of teaching and oversupply in others. Whilst exact balancing of supply and demand is not possible, and probably not desirable because of unforeseen changes, a closer estimate of trends is.

Whether Recommendation 8 will ever work is doubtful. The key problem is funding. Teacher education programs will not necessarily be able to attract the required share of Commonwealth and other funds available to their university in order to meet their tender obligations, without a willingness on the part of the Commonwealth to introduce tied funding for this purpose.

At another level, the cost of implementing the Report’s professional experience proposals will be enormous. It is doubtful if the NSW Government will be prepared to provide the additional funding necessary, nor does it seem likely that the present Commonwealth Government will.

Whilst the institution of scholarships may be successful in attracting talented people into teaching, without providing pathways to much higher salary levels for experienced teachers, there is not a good prospect of retaining many of these in teaching in the longer term.

**Recommendations 12 & 13:**

The Commission is fully supportive of the abolition of waiting lists. Their existence has denied the public school system of the best of each year’s graduating teachers. This must have a long-term negative impact on the public system.

This and certain other recommendations carry the need for careful negotiation with the NSW Teachers Federation and the Independent Teachers Association. Provision should also be made for consultation and advice with the Federation and with the two state school and the non-government school parent organisations.

**Recommendation 14:**

This recommendation did not go far enough. It failed to embrace the question of the accreditation of induction professionals to ensure that the quality of induction for beginning teachers is of the highest order. The Commission urges the Review to address this matter.
Recommendation 15:
Whilst fully supportive of its intent, the Commission notes that this recommendation fails to address the question of rewards or incentives for teachers to embrace ICT. It also does not come to terms with how to develop a school culture that values ICT.

Recommendations 16 & 17:
The Commission is supportive of these recommendations.

Policy directions 1 to 4:
The Commission is supportive of these. It is good to see the recognition of the importance of ‘values’. How Policy direction 2 is implemented will be of interest.

Policy direction 5:
It is assumed that ‘formally’ connoted ‘by legislation’. Without legislative force, there will be too many relatively powerful interest groups that will seek to control changes to the detriment of the whole proposal and to the interests of smaller participants in teacher education and schooling.

Policy direction 6:
The concept of advanced standing for school students who undertake vocational studies related to teaching has attractions. However, this may turn out to be counterproductive if such courses are taken instead of others that would give the intending teacher a better understanding of the major areas of human knowledge and endeavour. Already, the weakness of many K-6 teachers in mathematics, science and ICT has been the cause for comment. It would be unfortunate if the languages, humanities, social sciences and visual and performing arts were to suffer in favour of vocational training to fast track a student back into the classroom. The Commission is of the view that a breadth of understanding and experience are vital for effective teaching, not just pedagogical studies.

Policy direction 7 & 8:
Suitability tests at the point of entry to teacher training have their advocates. It can also be argued that they have their limitations. The validity of pencil and paper tests without personal interviews is questionable. Many applicants for positions in teacher education programs have had little or no prior experience as a teacher of others in a community group situations. There is also the presumption that these tests will have the ability to identify the range of qualities that are essential to teaching. The Commission is willing to concede that there might be scope for the use of cost-effective procedures which rigorous research has shown to be valid and reliable, provided that an over-heavy reliance is not made on these at the expense of demonstrated capabilities during professional experience in the classroom.

The number of possible applicants in any one year together with the cost of implementation, particularly if accompanied by interviews, would mean that scarce resources are allocated away from the most effective demonstration of suitability, namely substantial (rather than ‘significant’) professional experience in the early years of tertiary study.

The Commission is of the view that it would be a better application of resources to carry out testing within teacher preparation programs rather than before entry. Suitable exit paths and
career counselling are also desirable to assist unsuitable students discover other vocational possibilities.

**Policy directions 9 & 10:**
The Commission strongly supports this position. The corollary is that employers and the accreditation body should also accept graduates. Since resources are limited, it would be foolish to adopt the system developed by some parts of the United States of America where employers conduct additional tests to check on the universities. It should also be noted that the universities are not the only bodies that prepare teachers.

**Policy direction 11:**
The Commission is very supportive of moves to get away from the constricting uniformity of the past that has been such a disincentive for many teachers who do not wish to proceed into school or system administration.

**Policy directions 12 to 14:**
The Commission supports these. Direction 14 should not be confused with the position often taken by Departmental interviewing committees that place too much store on the validity of their interviews. The recorded results for professional experience on a transcript should reflect the combined judgement of the classroom supervisor and the university supervisor. It is these results that should be taken into account.

**Policy directions 15, 17 & 23:**
It is noted that the recommendations do not cover the development of para-professional pathways. The Commission urges the Review to take up this policy direction in reporting to Government.

**Policy directions 22 & 23:**
These directions are a welcome response to the Commonwealth Human Rights and Equal Opportunity Commission’s Rural and Remote Education Inquiry.

**Policy direction 31:**
The Commission strongly supports the involvement of parents in this and other appropriate points.

**Policy direction 37:**
The research for the Commonwealth on the National Competency Framework for Beginning Teaching showed how casual teachers suffered in the induction process. The Commission strongly supports this policy direction.

**Policy directions 43 & 45:**
There is an apparent contradiction between these two. The framework for, and bank of case law regarding, behaviour management is best dealt with in formal tuition. It is questionable
whether learning will be ‘primarily’ within the professional experience component of initial teacher education.

**Policy direction 49:**

Whilst the universities deserve a much more significant role in educational leadership preparation, the more specific requirements of particular schools or school groups are best handled by those providers or the professional development bodies that serve them.