

Before commenting on the Priority areas and the proposed actions, I make the following observations and comments.

Firstly, the Minister's media statement that the current situation has been ten years in the making is highly inaccurate. Barbara Preston raised the alarm almost thirty years ago and little to nothing has been done in the intervening years. There has been some foundational, and in most cases highly necessary, work completed but nothing to address the key issue of teacher attraction and supply.

The foundational work includes all jurisdictions introducing teacher registration and the National Framework for Teacher Registration, the development and broad acceptance by the profession of the Australian Professional Standards Teachers (APST), the National Certification of Highly Accomplished and Lead Teachers (HALT), the Accreditation of Initial Teacher Education programs in Australia (Standards and Procedures) and the development of Australian Teacher Workforce Data (ATWD) collection. The great fallacy in this work is that the Australian Institute for Teaching and School Leadership (AITSL) claims credit for the achievements when in truth it had little to do with this work.

The draft Plan reflects the risk adverseness of those on the Working Group and there is nothing to inspire confidence that it will make any difference. The actions proposed lack creativity and innovation and there is nothing to disrupt the entrenched lack of attention to the key issue, teacher attraction and supply. At best the draft Plan is ho-hum, been there, done that attempts at finding a way forward. It takes until action 28 to find something with a little innovation.

The draft Plan is poorly researched and lacking in structure and coherence. In places it uses incorrect terminology such as referring to accreditation when the nationally consistent wording is registration or certification depending on the context. Accreditation nationally refers to the approval of Professional Learning programs or ITE programs. To use incorrect wording for well-established and documented processes in a public document like this is highly disrespectful and lacking in appreciation of the importance of this work to education stakeholder and the teaching profession.

In places, there is little connection between the priority area, the actions proposed and the explanatory text. This demonstrates a lack of understanding of the subject matter by the writers and a lack of oversight by the working group or perhaps even a lack of engagement with the final draft by the working group. So much for the importance of the work to those given responsibility to take it forward. This is very disappointing for teachers and the teaching profession who are genuinely trusting the Minister when he says he has a high level of commitment to the success of Plan in tackling the current teacher workforce issues.

While not an action for inclusion in the Plan, Ministers must seriously consider and reimagine the national education architecture. AITSL must be owned by all jurisdictions, not just the Commonwealth, and its Board reconstituted to represent the full breadth of education stakeholders if it is to gain the respect of the teaching profession and rise above its current position as the political voice of the Federal Minister and Department. Similarly, ACACRA, ERO and ACECQA each need rethinking and realignment.

Most disappointingly, the draft Plan lacks commitment to teacher quality, simply privileging quantity to the detriment of quality student outcomes and meeting individual student needs.

The final Plan requires a clear statement of intention, with only actions that directly relate to that intention and have meaningful impact measures attached should be included. The Plan should be developed to evolve and expand with new actions introduced as evaluation of the impact measures dictate. The key questions before an action is included in the Plan must be 'Will this action make a difference to teacher supply or teacher demand?' and 'When will this difference be evident?'

A very tight evaluation plan is essential for the success of the Plan. Education Ministers should establish a new Teacher Workforce Evaluation agency, or a function within AERO, charged with conducting research to inform and refine the Plan, and developing and implementing the evaluation plan, including highly targeted impact measures, for each action in the Plan. This new Agency/function area should include independent experts in evaluation and measurement, and report directly to Education Ministers.

Other than detailing some Commonwealth funding and the cost of a few jurisdictional initiatives, the draft Plan is remarkably silent on the implementation cost of most actions. These costs may be prohibitive and impact the success of the Plan. A fully detailed costing of the Plan may indicate that it is too broad and needs to be more targeted to addressing the key issue of teacher supply and demand. Data collection within the understanding workforce needs priority is likely to require significant funding.

Elevating the profession (To recognise the value teachers bring to students, communities and the economy)

Do you have feedback on the actions proposed for 'Elevating the profession'?

- Yes
- No
- Unsure

The actions proposed recognise the value teachers bring to students, communities and the economy.

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

Actions 1 to 3 are predictable and unlikely to have any great impact on teacher attraction and supply. In short, this section is totally underwhelming.

Building the standing of the profession with the community should be an outcome of the Plan not an action in the Plan. The action should be marketing teaching to prospective applicants, both for teaching positions and ITE programs. That is, attracting and building supply.

A successful marketing campaign requires highly skilled professionals, extensive market research and substantial funding. The current Nursing and Armed Forces marketing are good examples for reference. The design and implementation of a marketing campaign should go to open tender to attract marketing and communication experts with the successful tender ideally including ex-teachers with marketing experience.

The development of communication resources for education stakeholders to use when promoting the teaching profession within the community is a worthwhile inclusion in the AITSL letter of expectation.

Action 2 is a rehash of the previous National Teacher Awards which were abandoned by a previous Government. Generally, this type of award system is not valued by classroom teachers and the profession. If this action is to be pursued, the intent needs to be clearer and adhered to during implementation to avoid the awards program becoming all things to everyone and no value to anyone. Building prestige and prominence of a new Teacher Awards scheme could be built through the national marketing strategy mentioned above.

While action 3 is worthwhile, it already happens. It is targeted towards end of career recognition. Having been involved with the OA nomination and assessment processes previously, many people find it arduous and difficult to navigate. Consideration should be given to tasking AITSL, in conjunction with jurisdictional central education offices, with supporting the development and submission of nominations. The creation of a specific class for Education within the OA structure, like the Public Service class, could be explored with the OA administration.

Action 4 should be combined with action 27 under the *better career pathways to support and retain teachers in the profession* priority. Setting research based targets rather than simply plucking numbers out of the air to meet a political imperative, again privileging quantity over quality and rigour, may suit some actions. HALT should not be treated this way. HALT certification is deserving of

more respect than this and needs to retain the rigour and integrity of the process. It would be more appropriate to leave target setting for HALT to individual jurisdictions rather than an arbitrary national figure.

Improving teacher supply (To increase the number of students entering Initial Teacher Education (ITE), number of students completing ITE and the number of teachers staying in and/or returning to the profession)

Do you have feedback on the actions proposed for 'Improving teacher supply'?

- Yes
- No
- Unsure

The actions proposed will be effective in increasing the number of students entering ITE, number of students completing ITE and the number of teachers staying in and/or returning to the profession.

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

Improving teacher supply is critical to addressing the current teacher workforce challenge. However, again the proposed actions are the same old same old but with slightly enhanced window dressing given the Federal Government's willingness to now throw a bit of money at the issue. Unfortunately, there are no impact measures to assure the accountability of this spend. The community and the profession, while interested in knowing the funding being directed at the proposed actions, are more interested in knowing the benefit that will accrue from this spend.

While current ITE data shows slight uptick in ITE enrolments for 2021, there has been a steady decrease in the number of people choosing to study teaching for each of the previous years, the most concerning data remains the level of non-completions. This indicates that a high number of places in ITE are being taken by people who are either not really interested in teaching or who are not suited to the profession. None of the proposed actions under this priority area seek to address the ITE non-completion issue, choosing rather to just bolster the number entering in the hope that with attrition the number graduating will perhaps fall to a level more commensurate with demand. It is important that the Plan clearly articulates what it means by 'best and brightest' and examines closely all ITE selection and student support processes.

Since the Preston report, there have been many 'hope and see' initiatives that have had no impact on improving the overall number of new teachers. Most notably, Teach for Australia (Action 7), which reportedly is the most expensive teacher training exercise in the world. It has a very low impact given the low number of its graduates who remain teaching in schools. Independent evaluation of this program should be an easy academic exercise. The light-weight evaluation of the Federal Government funded High Achieving Teachers program avoids the two key accountability measures, cost per completion and retention following graduation.

Action 5, an increase in Commonwealth Supported Places (CSPs) has merit and is welcomed, however these should be explicitly for ITE programs, not broader education related programs. Also, consideration should be given to reversion to a HECS liability if the ITE program is not completed or the graduate does not complete a required number of years teaching in schools to avoid places being consumed by people not intending to teach.

Action 6, while attractive to ITE applicants, would benefit from back-end incentives to generate return on the investment. Consideration of payment of HECS related expenses at the end of each

year of service following graduation is worth consideration. This could be extended to in-service teachers who still have HECS debts.

Action 9 must be implemented within the National Framework for Teacher Registration, especially the English Language requirements, so that quality continues to be privileged over the pursuit of quantity, and child safety is not compromised by relaxing international character checking.

Strengthening initial teacher education (To ensure initial teacher education supports teacher supply and delivers classroom ready graduates)

Do you have feedback on the actions proposed for 'Strengthening Initial Teacher Education (ITE)'?

- Yes
- No
- Unsure

The actions proposed will ensure initial teacher education supports teacher supply and quality.

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

ITE program accreditation is a jurisdictional responsibility and considerable work has been successfully undertaken by Teacher Regulatory Authorities, working constructively with the Council of Deans of Education, to implement the TEMAG recommendations and improve consistency and quality in the provision of ITE programs.

Given the draft Plan's key goal is to address the ever-widening gap between teacher supply and demand and the sizable Commonwealth injection of funding to incentivise the brightest and best students to choose ITE (actions 5, 6 and 7), finding a solution to the current 50% ITE completion rate should be the standout action. The points contained in action 10 are distractors from the main game and unlikely to impact completions. The key issue of low ITE completions should be more explicitly addressed with a stand-alone action.

The inclusion of action 10 in the draft Plan without a footnote indicating it is set in concrete and not subject to comment, some-what disingenuous by this omission. However, I will point out that the Terms of Reference for the Expert Panel do not require it to engage in any consultation with key stakeholders.

As RPL is already possible on entry into ITE programs, action 11 is unlikely prove to be a game changer. However, collaborative work with the ACDE and TRAs may assist with a more consistent approach. The outcome of this work should be a framework that both provides national consistency and ensures the current teacher qualification standard is retained or raised.

Positive interventions to address the under representation of First Nations people in the teacher workforce are most welcomed (action 12). Experience with previous initiatives indicates that a focus of this work should extend beyond the base numbers game to look closely at the attrition rate and the reasons behind this once First Nations teachers enter the teaching workforce. Consideration of initiatives to increase the number of First Nations people in teaching support roles, as a pathway to ITE, should also be included in this action.

The assessment of ITE student's literacy and numeracy skills (action 13) has been a vex issue for ITE accrediting authorities, ITE providers and ITE students since its introduction. The recent change to allow prospective students to sit LANTITE prior to commencing ITE, or earlier in the ITE program, is seen as a positive change as it allows ITE providers more time to support the low number of students requiring support. There does not seem to be evidence to support an increase in the permitted

number of resits beyond the current 5 sittings given that there is a minimal, around 2%, increase in passing numbers post the second sitting of the test. Action 13 provides little value to the Plan if it does not address the more pressing issues with LANTITE, including

- Cost to ITE students of sitting the test, and resits. While better feedback would be welcome, previous advice is that this will add significantly to the cost of each sitting. Perhaps a one off charge to the ITE student could be considered.
- Who should sit the test, undergraduate entries and graduate entries or just undergraduate entries?
- The on-going administration of the test, if ACER does not continue.

Maximising the time to teach (To improve retention and free up teachers to focus on teaching and collaboration)

Do you have feedback on the actions proposed for 'Maximising the time to teach'?

- Yes
- No
- Unsure

The actions proposed will improve retention and free up teachers to focus on teaching and collaboration.

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

I am unaware of any independent research that articulates the reasons why teachers are leaving or considering leaving the teaching workforce. Work done immediately following the Preston report estimated a high number of teachers, more than the accepted healthy workforce turn-over of 8%, intended exiting the workforce in the next ten years, interestingly this figure did not materialise. Conducting extensive independent research on teacher attrition, instead of relying on union research to support industrial claims, should be an action in the final Plan.

While the research mentioned above is essential, teachers should be able to focus on their classroom role including assessing and reporting student progress and outcomes, not on administrative tasks. In my experience as a teacher in schools and as a central office bureaucrat, the culprit for imposing on school operations and teaching time is central offices and poor IT based systems. There is nothing worse than different areas within central offices requesting the same information from schools or sending out conflicting directives to schools. An easy win in addressing workload is to reduce duplication by working with the 'do once, use many principle'. In my over 40 years in education, I did not see a school administrative system (computer based) than was better than the one it replaced.

Actions under this priority must be a mix of reactive and proactive. Reactive to minimise the current impact and proactive to avoid it reoccurring. A reactive action could be empowering schools to determine what they will do, with the focus on teaching and learning, and not do while proactive actions catch up and turn things around.

A single action to develop a teacher/school workload impact assessment process which fully costs the impact on school teaching and school time and the resources required before implementation can proceed should be sufficient for this priority. If an initiative does not meet the standard of no net impact on schools, it does not proceed. Pressure should be placed on bureaucrats to be attentive to their need to work with schools, not to do things to schools.

Action 18 is confusing in that surely school administrative staff are already used to reduce the administrative burden on teachers. Also, classroom support staff are in classrooms to support individual students with their learning. If the intent is to increase the number of support staff in schools, just say so. While employing ITE students in school support staff roles has merit, it already happens in most jurisdictions. If however the action is about employing ITE students in teaching

roles, this needs to be done within the teacher regulatory framework, and care needs to be taken that there is not an unintended impact of ITE non-completion rates due to a lack of support and burnout (refer NSW and Victoria's evaluations of their ITE employment programs).

Better understanding future teacher workforce needs (Improve the information available for teacher workforce planning)

Do you have feedback on the actions proposed for 'Better understanding future teacher workforce needs'?

- Yes
- No
- Unsure

How effective are the proposed actions in better understanding future teacher workforce needs, including the number of teachers required?

- Extremely effective
- Very effective
- Moderately effective
- Slightly effective
- Not effective at all

While progress has been made in the collection of information on the teacher workforce, using TRA held information and ITE provider reporting, at the national level through the ATWD to provide supply data, little progress has been made to bring demand information at any level of disaggregation into the national teacher workforce data collection. I expect that the Plan will have little impact on changing the current situation in the short to medium term.

This is disappointing as a desirable outcome of the Plan, as it was with TEMAG recommendation 39, must be the capacity to better target ITE provision to meeting the future demand for teachers, down to the specialisations required.

A key issue for the ATWD is the significant delay in the Commonwealth's collection of ITE data (action 20). The ACT was the only jurisdiction to respond positively to TEMAG recommendation 35 and now all ITE students undertaking a Professional Experience placement in an ACT school must register with its TRA. Consideration should be given to requiring all TRAs to register ITE students at entry into an ITE program. This would not only improve the quality of ITE data collection but would enable ongoing research into ITE provision.

Action 21 is confusing both in its language and combination of ideas. The language is confusing in its use of teacher accreditation when it may be referring to teacher registration. The action fails to acknowledge that nationally consistent standards for ITE currently exist. Perhaps the intention, although unstated, is to revise these standards. Establishing an NQF is an action that lacks clarity of purpose and intent. This action requires considerable reworking, and possibly separation into its differing parts in the final Plan. Its location under is priority area is questionable.

Like action 21, action 22 is unclear in its intent. Both look and feel like someone's personal crusade looking for its moment in the sun. It is very doubtful that these actions were discussed and agreed by the entire working group and were slipped in during the final flurry to get a draft plan out for consideration.

Teacher registration sits in jurisdictional legislation and requires applicants to meet legislated requirements. There is no legislative provision to provide registration pending provision of all required information and nor should there be, in the interest of child safety and quality education provision.

Action 23, unlike the preceding two actions, sits in this priority area and is highly worthwhile. TRAs as the custodians of teacher workforce data are best placed, with adequate Government funding, to collect teacher exit data to inform initiatives being developed by teacher employers to address

teacher attrition, either locally or nationally. While there are legislation and workload issues to address, it should be possible for TRAs to take on this role.

Better career pathways to support and retain teachers in the profession (To improve career pathways, including through streamlining the process for Highly Accomplished and Lead Teacher (HALT) accreditation, and providing better professional support for teachers to retain them in the profession)

Would you like to provide feedback on the actions for 'Better career pathways to support and retain teachers in the profession'?

- Yes
- No
- Unsure

The proposed actions will improve career pathways, including through streamlining the process for Highly Accomplished and Lead Teacher (HALT) accreditation, and providing better professional support for teachers to retain them in the profession.

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

The actions proposed under this priority area have little relevance to keeping teachers in the profession. It is highly doubtful that independent research into why teachers leave teaching would place any of the matters covered in the top ten or even top twenty reasons for teachers leaving.

It is worth noting that Education Ministers previously rejected certification against the Principal Standard and the inclusion of middle leadership standards in the National Standards Framework (Action 24). The articulation of an Accomplished Standard within the APST, recognising a teacher career stage prior to the HALT stages, would strengthen certification and the standards in general. This gap was intentionally left in the APST for jurisdictions to fill with recognitions such as the Victorian Expert Teacher level and the NSW/AITSL work referenced in actions 4 and 27.

Jurisdictional work, shared through AITSL, on leadership development and pathways to leadership may be helpful but not as a prerequisite for promotion to leadership roles.

The work outlined within action 25 is primarily the responsibility of jurisdictions and sectors. The development of guidelines, not national, must be informed by the sharing of good practice, and well research and effective initiatives. AITSL might well assist with the development of resources to support once jurisdictions have agreed on common guidelines.

The work intended by action 26 is very important but it doesn't fit in this Plan and not in this priority area. Evidence against APST 1.4 and 2.4 during ITE accreditation and progression to Full Registration processes can be problematic. Work is already being undertaken by AITSL to develop a culturally competent teaching workforce and this action should be placed in AITSL's statement of expectation to be advanced in consultation with jurisdictions, sectors and TRAs.

The ACT has streamlined the certification process by the introduction of its modular approach (action 27 and action 4), which allows the certification processes and payments for assessment to be progressive over three years. Other jurisdictions have adopted the ACT approach. Any action to explore equivalent recognition processes within the APST should not impinge the rigour and integrity of HALT certification. The work being undertaken by NSW and AITSL is not the equivalent of HALT certification and is likely to diminish HALT status by dragging HALT down to the level of the previous Advanced Skills Teacher models.

Actions to enhance the HALT model should focus on establishing clear roles for HALTs in schools, including remaining attached to the classroom in mentoring or modelling practice modes, with a high level of remuneration. There is scope to reconsider the current five year tenure attached to HALT certification.

Noting that HALT has not yet been taken up by all jurisdictions and that certification against the HALT standards was always meant to be voluntary, setting targets for HALT should be left to jurisdictions to determine. Again, the ACT, as perhaps the lead jurisdiction in HALT implementation, has already established a target of at least one HALT in every ACT school.

The development and use of micro-credentials (action 28) to drive high quality professional learning and the aggregation into a qualification, where appropriate, to allow teachers to build their formal qualification base is worthwhile and a welcomed inclusion in the Plan. However, it is unclear why QTR is being privileged over equivalent programs.