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Australasian Teacher Regulatory Authorities (ATRA) submission for public consultation on the Teacher Education Expert Panel (TEEP) discussion paper

Context of submission

ATRA comprises teacher regulatory authorities (TRAs) from Australia and New Zealand, as follows:

- Australian Capital Territory Teacher Quality Institute (ACTTQI)
- NSW Education Standards Authority (NESA)
- Queensland College of Teachers (QCT)
- Teacher Registration Board of Western Australia (TRBWA)
- Teachers Registration Board of South Australia (TRBSA)
- Teachers Registration Board of Tasmania (TRBTAS)
- Teachers Registration Board of the Northern Territory (TRBNT)
- Victorian Institute of Teaching (VIT)
- Teaching Council of Aotearoa New Zealand (TCANZ)

This submission does not represent the views of ACTTQI or TCANZ.

While ATRA has prepared a collective submission, it must be recognised that teacher registration and initial teacher education (ITE) accreditation are subject to jurisdictional and legislative remits and contexts.

TRAs have core responsibilities relating to the registration of teachers. One of the key requirements for teacher registration is that applicants are suitably qualified. Applicants for registration are generally required to hold qualifications from an accredited ITE program or one deemed equivalent. In this regard, TRAs accredit ITE programs.

The Panel will be aware that TRAs are guided by the *Accreditation of Initial Teacher Education Programs in Australia: Standards and Procedures* (Standards and Procedures) when assessing applications for accreditation. Education Ministers have endorsed the Standards and Procedures, and they facilitate a national approach to the accreditation of ITE programs.

ATRA is advancing a robust and harmonised approach to the accreditation and monitoring of ITE programs in Australia and endorses the Panel's recognition of the significant reform progress that has been made in the implementation of the Teacher Education Ministerial Advisory Group (TEMAG) reforms since 2015.

ATRA strongly encourages the Panel to make informed recommendations that complement and refine the work already progressed across the sector in response to TEMAG. Any further reform approach ought to be informed by robust evaluation and review of the TEMAG reforms.

ATRA supports a balanced approach to reform that recognises that teacher preparation is a shared system responsibility. Teacher preparation is not complete on graduation from an in ITE program. As is the case in all other professions, graduate teachers require supported and graduated induction to the profession, and all teachers require intentional professional learning and opportunities for growth across the career span.

Executive Summary

Reform Area 1: Strengthen ITE programs to deliver effective, classroom ready graduates

The Standards and Procedures are designed to be sufficiently high level so that as research in ITE evolves, the Standards and Procedures remain contemporary and continue to require adherence to best, evidence-based practices in ITE.

For that reason, ATRA recommends core content not be prescribed.

However, should the Panel determine amendments to the Standards and Procedures should proceed, ATRA recommends caution in embedding core content into the Standards and Procedures.

Instead, ATRA has proposed possible implementation solutions to the Panel and recommends that in making any changes, caution is given to ensuring continued integrity, sustainability and streamlining of accreditation requirements without compromising rigour.

The TPA is not an appropriate mechanism to assess core content because of its design. These same design features make the TPA a highly effective and contextual assessment of teaching practice. Instead, core content can be and is assessed through a range of other assessment tasks across the program.

To facilitate reform in this area, ATRA is committed to continuation of existing practices to ensure national consistency and harmonisation in the accreditation of initial teacher education programs.

Reform Area 2: Strengthen the link between performance and funding of initial teacher education

ATRA strongly recommends against the implementation of a system of performance funding for ITE, and requests that the Panel have careful regard for the associated risks.

ATRA also opposes the development of a system of performance funding that is integrated with or dependent on the existing accreditation system.

Current accreditation practices across Australia are already generating high quality performance measures that focus on impact, and ITE providers are engaged in cycles of continuous quality improvement through the accreditation cycle as required by Program Standard 6.

ATRA is in a sound position to give feedback on the key indicators presented by the Panel because of TRA involvement in the accreditation and annual reporting processes, which have strong regard for quality measures.

The key indicators proposed are one-dimensional in nature and focus on several areas that sit outside ITE provider control and influence. The development of indicators of quality in ITE should have regard for factors within ITE provider sphere of influence and be focussed on impact, for example, TPA results, or the results of Principal/Employer surveys.

Reform Area 3: Improving the quality of practical experience in teaching

Comprehensive system level agreements have been developed across a number of settings to support the delivery of professional experience. However, high quality professional experience requires sufficient resourcing, professional development and support for mentor teachers, time release, and collaboration between stakeholders. There are a number of options for incentives to support schools to be more involved in professional experience.

Reform Area 4: Improving postgraduate ITE for mid-career entrants

Across Australia, there are a number of flexible and innovative approaches to the delivery of a Masters ITE qualification that enable preservice teachers to enter the classroom as teachers or paraprofessionals while studying, or through an internship arrangement. These programs enable preservice teachers to assume a variety

of different types of roles in classrooms while studying, and as such, changes to regulatory arrangements are not required. However, the Panel should note the development and delivery of innovative programs and programs that specifically support mid-career entrants are expensive and resource intensive. Funding and time-release for mentor teachers is required, to support more wide-sweeping implementation.

Reform Area 1: Strengthen ITE programs to deliver effective, classroom ready graduates

Background to Reform Area 1

ATRA endorses the teaching of evidence-based practices in ITE programs as a mechanism to ensure graduate teacher quality and readiness.

However, ATRA offers caution with respect to making blanket assertions about failings in graduate preparedness, as evidence would suggest otherwise.¹ For example, Employer Satisfaction Surveys indicate an 85.6% satisfaction rate for education graduates in 2022.² In Western Australia's 2022 Department of Education Principal Perceptions of First Year Graduates Survey, 94% of respondents agreed their graduate had a positive impact on student learning.

Further, it is important to recognise that the core content is generally already integrated into ITE programs; it is just not explicitly mandated as presented in the discussion paper.

Critical to any discussion about the quality of ITE is the meaning of 'classroom readiness'. Consensus about the meaning of graduate teacher readiness to teach upon graduation is critical to managing expectations of government, employers, ITE providers, and the public. In arriving at consensus, it is vital to recognise that ITE is only *initial* teacher education, and that like any other profession, graduate teachers require supported induction to the profession and ongoing quality professional development.

A relevant contextual detail to reform area 1 is that the Standards and Procedures require that accreditation panels consider the extent to which a program's development, design and delivery has taken account of contemporary and emerging developments in education (2.2).³ To that end, ITE programs must be grounded in evidence of program inputs including contemporary curriculum, employer and system expectations, and workforce demands. The inclusion of practicing teachers and initial teacher education professionals on accreditation panels supports robust consideration of this requirement. Further, the framework for all ITE programs in Australia is the Australian Professional Standards for Teachers (APST), and all 37 descriptors must be demonstrated by preservice teachers on completion of the program. The APST describe the practice and expertise expected at the four career stages and are expressed at a sufficiently high level so that they remain contemporary and applicable despite evolutions and developments in best practice and research in education.

Whilst ATRA notes that the APST are not currently listed as being in scope in the TEEP's Terms of Reference; the APST have been mapped to the core content areas on page 7 of the discussion paper, and this has prompted consideration of the APST by ATRA. Additionally, the Graduate teacher level of the APST underpin Program Standard 1.1 and Template 3 and are therefore a critical element of the nationally agreed accreditation process. ATRA have provided supplementary mapping of the APST to the core content areas in Appendix 1.

Finally, it is important to note that should the Standards and Procedures be amended, a national change management plan would need to be implemented, and have regard to, inter alia:

- revision to the Standards and Procedures and accompanying Guidelines and supporting templates
- re-publication of documentation
- re-education and training for HEI staff involved in the accreditation process, and HEI staff affected by any changes
- changes to ITE programs
- development and delivery of panellist training including re-training of all existing ITE panellists
- transition plans and arrangements for currently accredited programs to meet changed standards.

¹ Gore, J., Rosser, B., Jaremus, F. et al. Fresh evidence on the relationship between years of experience and teaching quality. *Aust. Educ. Res.* (2023). <https://doi.org/10.1007/s13384-023-00612-0>

² [https://www.qilt.edu.au/surveys/employer-satisfaction-survey-\(ess\)](https://www.qilt.edu.au/surveys/employer-satisfaction-survey-(ess))

³ *The accreditation of initial teacher education programs in Australia: Standards and Procedures* (2019)

Evidence-based teaching practices: are there other evidence-based practices which should be prioritised in ITE programs?

Recommendation

ATRA strongly cautions against the prescription of core content.

However, if core content is prescribed, it should not be included in the Standards and Procedures but be incorporated into an attachment or addendum that is referenced in the Standards and Procedures.

ATRA accept and support the identified core content areas as being of importance to ITE as contemporary evidence-based practices.

However, ATRA cautions against the prescription of core content. This is because research, best practice, and innovation in education will always evolve and develop over time, meaning the prescribed core content could become out-of-date or other content could be prioritised as research, society and education evolve. Therefore, prescribing core content would considerably hinder the ability for the existing system of accreditation to respond with flexibility and agility to developments in best practice and contemporary research in education.

Amending Accreditation Standards and Procedures: how should the accreditation Standards and Procedures best be amended to ensure all ITE students learn and can confidently use these practices?

The Standards and Procedures are expressed in a way that allows panel expectations to shift and evolve along with best-practice and current research, while also maintaining a nationally consistent expectation for all ITE programs.

ATRA does not consider that evidence-based practices need to be defined, or that specific practices should be prioritised, as the current Standards and Procedures already ensure the program is based on authoritative and evidence-based understandings of how the program will develop effective teachers. The core content, as presented by TEEP is already largely delivered in ITE programs as a result of the existing Standards and Procedures framework and accreditation processes.

In particular, ATRA would draw the Panel's attention to several Program Standards that speak to this requirement:

- 1.1 Program design and assessment processes identify where each Graduate Teacher Standard is taught, practised and assessed and require that preservice teachers have demonstrated successful performance against all of the Graduate Teacher Standards prior to graduation.
- 2.1 Program development, design and delivery are based on:
 - a. a documented coherent rationale based on authoritative and evidence-based understandings of how the program will develop effective teachers who meet the Graduate Teacher Standards, including having a positive impact on student learning
 - b. a coherent and sequenced delivery of program content including professional experience that facilitates achievement of the Graduate Teacher Standards.
- 2.2 Program development, design and delivery take account of:
 - a. contemporary and emerging developments in education, curriculum requirements, community expectations and local, employer and national system needs, including workforce demands for teaching specialisations
 - b. the perspectives of stakeholders such as employers, professional teacher bodies, practising teachers, educational researchers, and relevant cultural and community experts.
- 4.2 Initial teacher education programs prepare preservice teachers for the school curriculum and learning areas of their chosen discipline and/or stage of schooling. *Program Standard 4.2 is accompanied by a schedule which highlights required quantum for discipline specific curriculum and pedagogical studies.*

Further, the accreditation panel process, which brings together employers, teachers, and teacher educators, ensures that assessment against these Program Standards is robust and that the delivery of ITE is informed by contemporary best practice.

However, if it is determined that core content must be prescribed, ATRA strongly cautions against its prescription through the Standards and Procedures which are approved at the Ministerial level. ATRA also cautions against imposition of new accreditation requirements that impose an excessive regulatory burden on ITE providers.

To maintain a level of flexibility, agility, and responsiveness in the accreditation system, it would be preferable for core content to be set out in an attachment or addendum to the Standards and Procedures and for the Standards and Procedures to be slightly amended to require engagement with that document.

Such an attachment or addendum would need to be evidence and research based, and its implementation and ongoing revisions as research develops would need to be subject to agreement across ACDE, TRAs and AITSL.

This approach is unlikely to add burden to ITE providers, panels, or accrediting authorities. It offers certainty about the inclusion of evidence-based practices and content, while maintaining a degree of flexibility to ensure contemporary best practice continues to be upheld over time through the accreditation process.

To facilitate such an approach, the following principles should be considered:

1. **Integrity:** The Standards have been developed and categorised with particular 'intent' in mind. For example, Program Standard 1 concerns program outcomes and outputs, whereas Program Standard 2 is focussed on development, design, and delivery. As such, the focus and intent of changes needs to be considered, and changes need to be made in the appropriate places to ensure the integrity of the Standards is maintained.
2. **Sustainability:** Changes should be future proofed to avoid ongoing changes to the Program Standards which are approved at Ministerial level. This is in line with one of the principles of national accreditation which is ensuring its flexibility, diversity, and innovation. For instance, while the Program Standards could be amended to require engagement with the core content, what the core content is should be contained elsewhere, such as a schedule or addendum that can be updated as developments in education occur.
3. **Streamlining while maintaining rigour:** The existing process of accreditation is highly rigorous; any amendments should have regard to the need for streamlining with existing requirements, and identifying elements of existing requirements that may not be necessary.

In line with these principles, ATRA proposes possible approaches to slight amendments to the Standards and Procedures below, with the advantages, disadvantages, and potential risks of each outlined in Appendix 2.

ATRA notes that approach 1 and 2 are mutually exclusive but approach 3 would likely need to complement both because the program rationale informs the overarching design of the program.

In making any amendments to the Standards and Procedures, updates to the glossary should also be made to facilitate consistent implementation. Further, amendments to Templates should have clear, explicit, and detailed guidance to facilitate consistency in implementation. To support any of the changes proposed in Appendix 2, amendments would also need to be made to the *Guidelines for the Accreditation of Initial Teacher Education Programs in Australia*.

Should the Accreditation Standards and Procedures be amended to require TPAs to assess these practices?

Recommendation

The TPA is not an appropriate tool to assess the core content practices, and instead, the core content can be assessed by other assessment tasks elsewhere in the program.

The TPA is a tool designed to assess the knowledge and skills of preservice teachers. To be successful in completing the TPA, preservice teachers are required to:

- Use baseline data, evidence and information about student needs to identify learning goals in planning for responsive teaching
- Teach a sequence of lessons in one learning area/subject
- Collect and use evidence of learning to monitor progress, adjust teaching, and provide feedback to the students
- Reflect on impact of teaching to consider the next step to improve student learning.

TPAs require preservice teachers to make data-informed decisions and implement interventions and strategies to improve student learning in the teaching and learning context in which the TPA is being undertaken. In successfully completing the TPA, a preservice teacher demonstrates the skills and knowledge required of a teacher.

As indicated at the outset of this submission, ATRA would caution against changes without regard for robust evaluation. As noted in the QITE review, evidence of TPA impact is to date, limited given its recent introduction. However, early research has demonstrated the power of the TPA.⁴ The Graduate Teaching Performance Assessment (GTPA) consortium, which was one of the first endorsed TPAs in the country, have confirmed the TPA directly improves classroom readiness and the GTPA helps ITE students to bring together learning and demonstrate capability.

The way in which TPAs are currently assessed would not lend itself to the proposal that TPAs be required to assess the practices proposed by the Panel. While the proposed strategies hold merit in particular contexts and circumstances, to mandate their inclusion in the TPA would detract from the complexity of the teaching and learning cycle, analysis of student evidence and data, and teacher reflection on practice. Teaching and learning occurs in context and practices must be adjusted to suit the particular group of learners, and this is the complexity the TPA is designed to assess. TPAs take place in the final professional experience and the task is sufficiently broad so that it can be implemented in different subject areas or school contexts.

Appendix 2 sets out possible amendments to the Standards and Procedures to implement the core content in accreditation processes, rather than amending the TPA to require assessment of core content, it may be more appropriate for the accreditation process to demonstrate where elsewhere in the program the assessment of the core content occurs.

Curriculum specific content: What steps should be taken to ensure curriculum specific ITE content embeds the evidence-based practices?

Please see above. The principles and proposed solutions are applicable to this discussion question.

⁴ Australian Government. (2022). *Next Steps: Report of the Quality Initial Teacher Education Review* <https://www.education.gov.au/quality-initial-teacher-education-review/resources/next-steps-report-quality-initial-teacher-education-review>

Ensuring consistent robust delivery of evidence-based teaching practices: What changes to the authorising environment are required to ensure consistent application of the Accreditation Standards and Procedures and implementation of core content in ITE programs?

Recommendation

No change to the authorising environment is required, ATRA would support working in partnership with AITSL to support greater quality assurance in ITE.

ATRA does not consider it necessary for there to be any changes to the authorising environment. ATRA would propose that the solution to any concerns related to the authorising environment expressed by the Panel are already addressed through existing practices:

- Nationally agreed approach to the accreditation of ITE programs as outlined in the Guidelines and Standards and Procedures
- National training program for accreditation panel members delivered by AITSL in conjunction with all TRA's
- The inclusion of at least one interstate panellist in every ITE accreditation panel for the purpose of ensuring national consistency
- Participation in national standard setting activities
- Regular collaboration between TRA's and AITSL, including but not limited to ATRA Executive Officer / ITE / Senior Officer working groups and the Teacher Quality and Regulation Forum (TQRF). In these working groups, TRA's along with AITSL work alongside one another to ensure national consistency and work towards harmonisation.
- National consultation on the revised Standards.

ATRA will continue to take steps to ensure, as much as is possible across our different legislative contexts, that regulatory policy and practice in relation to ITE is consistent and harmonised where appropriate. ATRA is committed to working collaboratively to support quality assurance in ITE.

Reform Area 2: Strengthen the link between performance and funding of initial teacher education

Background to Reform Area 2

At the outset, it is vital to note that the existing system of ITE accreditation is already set up to drive program quality improvement. However, any proposal to incorporate an assessment of performance indicators with university funding implications into a TRA administered scheme is opposed by ATRA. Should the Commonwealth wish to introduce a differentiated funding mechanism based on the assessment of quality indicators, this should be independent of the accreditation process as university funding sits outside the remit of TRAs.

ATRA's responses to the discussion questions therefore must be read in this context. The responses are designed to give feedback in relation to the panel's proposed indicators and are in no way an endorsement of the overarching proposed approach to a system of performance funding.

The notion that a system of reward funding and punishment or embarrassment would drive quality improvement in ITE is deeply flawed and fails to recognise the complexity of the ITE context, and good practices of performance measurement. Strong regard must be had for the potential risks and unintended consequences:

- Loss of ITE providers from the system, further worsening teacher workforce shortages and contributing to a lack of diversity in ITE
- Punishment of ITE providers who due to their size, location or market are unable to perform against some indicators.
- Reward for those ITE providers who due to their size, location and market inevitably perform well against some indicators.

It is important for the Panel to understand that the existing system of accreditation *already* plays a significant role in driving quality improvement in ITE.

Program Standard 6 requires accreditation panels to assess ITE providers' Plan for Demonstrating Impact (Template 4). In Template 4, ITE providers give impact data in relation to preservice teacher performance, classroom readiness, graduate outcomes, and program impact.

Specifically, ITE providers identify how they will select, use, and analyse evidence that is relevant to assessing the delivery of the program, including mandatory evidence required by Program Standard 6.3, which includes:

- Aggregated assessment data from the teaching performance assessment for all preservice teachers
- Aggregated assessment data from any other assessments identified in a plan for impact as contributing to evidence in relation to preservice teacher performance and impact
- Aggregated assessment and outcomes data linked to individuals and/or cohorts of interest, including selection cohorts
- Data and evidence from participation in national and jurisdictional data collections
- Evidence of the outcomes of graduates and/or graduate cohorts.

In assessing these plans for demonstrating impact, accreditation panels determine whether the selected data will provide evidence of impact of graduates on student learning and preservice teacher performance. Panels critique the plans to ensure the selected data collections will be sufficient to inform and drive program quality improvement.

The way in which this system drives quality improvement is evident nationally. For example, the situation in Queensland where the majority of ITE programs have attained Stage two accreditation for the second time, is an apt illustration of the power of the existing accreditation process for program improvement. ITE providers take seriously their Plans for Demonstrating Impact and carefully contemplate the best performance indicators that will drive meaningful program improvement. As a result, stakeholders are consistently pleased with the quality and performance of graduates from these programs and graduate teachers are confident in their classroom readiness.

As such, ATRA would suggest the Panel adopt considerable caution in recommending implementation of a system of performance-based funding.

Should a system of performance funding be implemented, it would need to be independent and detached from the existing system of accreditation. The accreditation of ITE programs is not designed to inform federal funding, nor is this within the legislated scope of activities for TRAs.

ITE performance measures: Are there additional indicators that should be considered?

Recommendation

Performance funding should not be implemented.

If a system of performance funding is designed however, regard must be had to the concerns and proposed amendments set out in Table 1.

A national Principal survey on graduate teacher performance should be explored.

In addition to overarching concerns about performance funding, ATRA holds concerns about the specific performance indicators proposed.

These concerns stem from use of the indicators in isolation, which gives rise to a blunt and potentially unfair reading of ITE quality across providers because they fall outside the ambit of their control. Concerns are also raised in relation to potential unintended perverse consequences that could arise where performance-based funding is implemented against these indicators. Placing too much weight on any one indicator is highly problematic, and any decisions should be made on the basis of a global assessment.

Some key concerns and suggested amendments are outlined in the Table below.

Indicator Category	ATRA Concerns	Suggested Amendments
Selection indicators	<p>A full picture of diversity is not captured by the diversity indicator; LGBTIQ+, students from linguistic or culturally diverse backgrounds, students with disability, are not addressed.</p> <p>Subject to geographic factors that ITE providers cannot change, i.e., regional, and remote participation.</p> <p>Targeting and recruitment of some vulnerable target student groups to enter courses without regard to their capacity to complete.</p>	<ul style="list-style-type: none"> • More complete representation of diversity • Indicator to be read against contextually appropriate benchmark (e.g., similar size and location provider) • Complement of support indicators (e.g., availability of specific mentoring supports) • Importantly, measures need to have regard for the fact that a one-size-fits all approach to attracting groups is insufficient. Some ITE providers designing programs to cater for diversity may implement more supports and preservice teachers may take more time to complete the program, but ultimately this would be a measure of success for an ITE provider in that context.
Retention indicators	<p>First year attrition can be positive because it shows ITE providers have provided early professional experience and students have decided teaching is not an appropriate career for them, so they leave the course without significant financial or personal impact.</p> <p>First year attrition could be for reasons of: family, work, medical circumstances, personal decisions, or possibly a shift from full-time to part-time study load.</p>	<ul style="list-style-type: none"> • Nationally consistent exit survey responses so that departure unrelated to ITE quality is not considered as a reflection on ITE provider quality to reflect that some preservice teachers are not retained in ITE programs because they have not met the required standard or have withdrawn for personal issues.

	<p>Poor program quality is only one of many possible reasons for program attrition.</p> <p>Six-year drop-out rate attributable mostly to personal circumstances</p>	
Classroom readiness indicators	<p>While QILT indicators are quality national consistent measures of student course satisfaction, they are not necessarily indicative of classroom readiness.</p> <p>That is, student satisfaction is heavily influenced by their perceptions of individual teachers/assessment fairness and may be unfounded/misguided.</p>	<ul style="list-style-type: none"> • Complement with QILT’s employer satisfaction survey • Complement with TPA results • Principal, Employer and Graduate Surveys that are purpose-built, such as the Graduate Teacher Survey (Vic) and the Principal Perceptions of First Year Graduates Survey (WA)
Transition indicators	<p>Employment beyond graduation sits outside ITE provider ambit of control, i.e., teacher and employer decision.</p> <p>Unless complemented by other measures, employment in context of workforce shortages demonstrates little about graduate teacher quality or ITE program quality.</p>	<ul style="list-style-type: none"> • Complement with QILT’s employer satisfaction survey • Complement with TPA results

Table 1 Proposed amendments to proposed performance measures

One of the most powerful indicators of quality is student performance on the TPA. At the outset, it is unfortunate that given the TPA was a celebrated and significant TEMAG reform and an element of ITE that was given significant weight in the Quality Initial Teacher Education (QITE) Review (mentioned 99 times),⁵ the TPA has been neglected by the Panel as a potential quality indicator.

The TPA holds significant weight as a performance indicator for a number of reasons, including:

- The TPA is a compulsory national capstone assessment task
- The TPA is designed against a common set of criteria (as per the original PS 1.2)
 - o The TPA must be a reflection of classroom teaching practice, including the elements of planning, teaching, assessing and reflecting
 - o Be a valid assessment that clearly assesses the content of the Graduate Teacher Standards
 - o Have clear, measurable and justifiable achievement criteria that discriminate between meeting and not meeting the Graduate Teacher Standards
 - o Be a reliable assessment in which there are appropriate processes in place for ensuring consistent scoring between assessors
 - o Include moderation processes that support consistent decision-making against the achievement criteria.
- The TPA is situated in a classroom environment, and is demonstrative of authentic teaching practice
- The TPA is an assessment of the content of the Graduate Teacher Standards
- All TPAs have been assessed and endorsed by a national Expert Advisory Group prior to use in ITE programs.

In addition to the reliability of the TPA as an assessment task, these features characterise it as a germane and representative performance measure of graduate teacher quality.

TPA data is currently collected on a national basis as one of the nationally required data reported on by ITE providers to AITSL each year, it also features in ITE providers Plans for Demonstrating Impact and evidenced at Stage two accreditation.

⁵ Australian Government. (2022). *Next Steps: Report of the Quality Initial Teacher Education Review* <https://www.education.gov.au/quality-initial-teacher-education-review/resources/next-steps-report-quality-initial-teacher-education-review>

A key point of relevance of the TPA as a performance measure is its connection to ITE provider performance improvement. Because of the consistent EAG endorsement process which ensures consistent and moderated marking, the TPA grades are not subject to perverse incentives. ITE providers utilise TPA assessment data, through the Plan for Demonstrating Impact, to drive program change for improvement.

Another powerful indicator is survey feedback from school principals. Professions are characterised by expertise, altruism and ethics which make them worthy of trust. As such, feedback from within the profession about the profession should be a key indicator of quality. School leaders and principals are equipped as professionals to make accurate and sound judgements on graduate teacher quality.

A key example of how effective principal views are on graduate teacher performance is the Department of Education of Western Australia's annual survey of principals about first year graduate performance; specifically, their preparedness to teach, and transition into teaching in public schools. Because the survey is completed by the school principal or other appropriate staff (e.g., a deputy principal or member of middle leadership), it gives an accurate overview of graduate teacher performance on a range of areas including graduate performance against the APST, literacy and numeracy performance, key capabilities associated with successful teacher, impact on student wellbeing, and impact on school community.

For example, in 2022, 434 (78%) responses were received. Salient findings of that particular round of surveys included:

- 94% agreed that their graduate had a positive impact on student learning
- 95% agreed that their graduate had a positive impact on student wellbeing
- 90% agreed that their graduate had a positive impact on the school community.

Previously in Victoria, the Graduate Teacher Survey generated important insights into principal perceptions of graduate teacher performance in schools.

ATRA recommends that a survey similar to that used in WA or previously used in Victoria, be implemented nationally.

To what extent should performance measures form the core part of the evidence requirements in provider Plans for Demonstrating Impact required in the Accreditation Standards and Procedures?

Recommendation

Performance measures used for performance funding should not be used as part of the evidence requirements in ITE providers' Plans for Demonstrating Impact.

A number of the proposed indicators set out in the left-hand column of Table 2 above are already included in ITE provider's Plans for Demonstrating Impact (Template 4) and play an important role in quality improvement.

Presently, the Structure of Template 4 is such that ITE providers use triangulation of data to demonstrate outcomes against Impact Statements. As a result, Template 4 data generated by ITE providers is much richer than standalone indicators.

As is highlighted above, performance funding should not intersect with the system of accreditation.

Public reporting: Should the Australian Teacher Workforce Data collection be the basis for reporting and publicising the performance measures? Are there other approaches for reporting the performance measures?

Recommendation

The ATWD could provide a platform for reporting and publication of performance measures, however, the Panel should be aware that ITE providers report annually on a range of measures to AITSL.

Currently, ITE providers report annually to TRAs on a range of measures, including data identified in the plan for demonstrating impact (Template 4) to measure ongoing performance of their programs, changes to the ITE programs, nationally required data to contribute to national data collections for compliance and accountability purposes, and any jurisdictional specific data that is required.

This annual reporting data and information already provides a comprehensive and valuable set of information about the performance of ITE programs across the country.

Public transparency: if made publicly available, are these performance measures sufficient to drive quality improvements in ITE?

Recommendation

The proposed performance measures are not sufficient to drive quality improvement in ITE, but the existing system of accreditation is effectively operating to drive quality improvement.

ATRA strongly recommends the completion of a longitudinal evaluation of the implementation of the TEMAG reforms before embarking in any further reform in this space.

It should be noted that accredited programs currently do publish information for the wider public, including the quality assurance processes they have in place. Further, annual reporting data is submitted to AITSL by ITE providers under the requirements of Program Standard 6.4.

Reporting publicly on performance measures may assist with transparency, however it is critical to consider unintended consequences that have resulted in similar adjacent reforms that involve transparency measures, such as MySchool.

ATRA considers investment in the improvement of professional experience placements and requisite support structures within the system is the key to drive quality improvement in ITE over the proposed use of performance measures.

ATRA would also strongly encourage the Panel to consider implementation of longitudinal evaluation of the existing TEMAG reforms to determine the extent to which these reforms have already progressed quality improvements in ITE. This would ensure any future reforms proposed to drive quality improvements in ITE would be evidence-based and serve to extend and refine work already done.

Transition funding to support performance improvement: How could transition funding be used to set higher education providers on a path to improving the quality of their programs?

ATRA is not in a position to comment.

Excellence pool for higher quality programs: How could a system of reward funding be best designed to support high performing ITE programs and encourage them to increase their enrolments? Are there any risks to such an approach and if so, how should they be addressed?

Recommendation

There are significant risks associated with this proposed approach, ATRA strongly recommends not implementing this type of approach.

In the longer term, this type of approach has the potential to limit student choice and provider diversity. A system of reward funding may lead to a situation in which high performing ITE providers continue to win funding thereby growing the student body in those settings. Potentially, smaller or struggling ITE providers may consider that over time, offering ITE programs is no longer sustainable.

There are additional risks involved in a reward funding system related to perverse outcomes. Using funding to encourage enrolments, and particularly enrolments from diverse backgrounds, may contribute to a situation where

ITE providers recruit and enrol individuals and groups who may not be suited to higher education study, or the teaching profession.

Reform Area 3: Improving the quality of practical⁶ experience in teaching

Background to Reform Area 3

The contemporary context of teacher workforce shortages has necessitated increased and more innovative use of existing types of alternative authorisation to teach outside provisional and full registration. In this environment, preservice teachers can be classified as being ‘preservice’ or ‘inservice’ in that many will be effectively teaching or working as a teacher-aide or paraprofessional while completing their ITE program.

ATRA notes this dynamic adds a layer of complexity to the arrangement and implementation of professional experience. Across jurisdictions work has been and will continue to be done to establish policy and guidance to support high quality professional experience in situations where preservice teachers hold an approval to teach.

Aside from this, ATRA acknowledges the fundamental role high quality professional experience plays in an ITE program, and notes that the quality of professional experience tends to be reliant on factors outside the remit of the accreditation process.

Specifically, it is vitally important to recognise the role of sector-wide goodwill, collaboration, partnership, and cooperation as being the cornerstone in the delivery of high-quality professional experience.

However, this type of system also requires resources to ensure sustainability. For example, when faced with workforce shortages, schools are unable to offer sufficient relief or support to mentor teachers.

System level agreements: Would establishing more comprehensive system level agreements between school sectors/systems and higher education providers address challenges in the school matching process and deliver more effective placements? How could these agreements complement current localised arrangements?

Recommendation

ATRA endorses an approach of establishing more comprehensive system level agreements, however, ATRA encourages the Panel to consider and learn from existing agreements in place.

ATRA supports the establishment of more comprehensive system level agreements at the jurisdictional level where considered appropriate, and notes that a collaborative sector-wide approach would support and enhance existing matching processes and allow for agreements that underpin the elements required for an effective placement. These agreements may include reference to school resourcing, mentor teachers, and integration of theory and practice.

Comprehensive system level agreements have been implemented in several jurisdictions. For example, Queensland’s Professional Experience Partnership Agreement (PEPA) reflects mutual responsibilities of ITE providers and school sectors, the QCT and unions were involved in the negotiation of this agreement. The QCT also runs bespoke workshops for mentor teachers about best practices in providing mentoring and support for beginning teachers.

Similarly, Victoria currently has a sector wide agreement to manage professional experience placements, which includes agreed timings to organise placements, as well as shared templates for mentor observations and feedback. Victoria continues to seek opportunities to improve these agreements and is currently working across sectors to develop bespoke support and workshops for mentors and preservice teachers.

In the Northern Territory, the Department of Education NT and Charles Darwin University (CDU) partner under the Teaching Schools Partnership, which is a strong example of a comprehensive system level agreement between a school system and higher education provider. Established in 2006, the Partnership facilitates professional experience placements for pre-service teachers enrolled at CDU in partner schools across the Northern Territory. The Partnership’s key focuses are:

⁶ ATRA notes ‘practical’ has been used by the Panel. As the Standards and Procedures refer to ‘professional’ experience, both are used.

- Improving student learning outcomes
- Building a common language of instruction
- Offering pre-service teachers, opportunities to learn using modelling and coaching principles, and
- Providing professional learning and development in accordance with the Australian Professional Standards for Teachers

Since its inception, 113 schools across the Northern Territory have joined the partnership. The Partnership Agreement builds a relationship between placement schools, the NT Department and CDU through networking and communication. Partner schools are involved in placement planning and school staff are given opportunities to participate in professional learning to help them mentor and support pre-service teachers. Schools also receive financial support from the university to help them host pre-service teachers. Pre-service teachers can apply for a travel grant to help facilitate their placement in a remote context.

Relevantly, while these agreements can and do support the process of matching preservice teachers to school settings, they do not independently lead to more effective placements. More important to placement quality are on-the-ground factors including school resourcing, mentor teacher training, mentor teacher support (remuneration, time), and the extent to which a school culture values and invests in preservice teacher education. This reality speaks to the need for additional funding to support high quality professional experience.

Would encouraging centres of excellence, such as hub schools, support high-quality practical experience? What are the impediments to delivering these centres of excellence?’

ATRA is not in a position to comment in relation to centres of excellence and hub-schools.

Would higher education providers, schools and teachers benefit from more specific guidance in delivering practical experience? What guidance would be beneficial to address key barriers to high-quality practical experience?

Recommendation

All parties would likely benefit from more specific guidance in delivering professional experience. In developing recommendations in relation to this guidance, the Panel are encouraged to consider existing guidance materials around Australia.

Any guidance material must be responsive to the recognition that initial teacher education is initial, and preservice teachers must be guided and supported as such.

The premise of this discussion question suggests that additional guidance is required to improve practical experience, however, it is important to note that Guidance can be beneficial where support, funding and time is provided to support adherence to those best practices.

There is currently a significant body of Guidance material in place across Australia that is designed to support professional experience. For example, AITSL’s Key components of professional experience in initial teacher education in Australia and case studies, and AITSL’s online supervising preservice teachers – online training program. States and territories have also developed resources, for example, in NSW the [NESA Framework for High Quality Professional Experience](#) has been developed to support the implementation of high quality professional experience and Queensland’s Department of Education has developed an online professional development program for Supervising Teachers.

Further, TRAs have developed principles and guidance materials to support preservice teachers, ITE providers and employers in contexts where preservice teachers are engaged on alternative authorisation to teach and simultaneously must complete their professional experience. For example, NESA has developed Principles for the employment of *Conditionally Accredited Teachers*, QCT has developed the *Principles for Permission to Teach – For*

stakeholders engaging with preservice teachers, VIT has developed the Fact Sheet – Permission to teach (PTT), and Guidance for supporting PTT holders, and Fact Sheet: PTT, supervised teaching practice and teaching performance assessment.

Critical to the development of any additional guidance material is the need for it to firmly align with the notion expressed at the start of this review – the recognition that initial teacher education is initial, and so preservice teachers must be guided and supported as such while on professional experience irrespective of alternative authorisation to teach status.

What support for students would be beneficial to assist in managing their practical experience requirements?

ATRA considers that ITE providers are responsible for the management of a student's professional experience placement as required under the Standards and reinforced in agreements in some jurisdictions.

How can practical experience be better integrated with the academic component of ITE programs to support ITE student learning and preparedness to teach?

ATRA considers that professional experience is already well integrated with the academic component of ITE, and the incorporation of the TPA is just one demonstrated example of the clear link between the practical element and the theory in practice within an ITE program.

What incentives can be offered to schools to be more active participants in ITE placements?

ATRA believes this is where the most impact can be had to improve the quality of professional experience placements, given they happen in the educational setting. Therefore, incentives or investments in the following would support schools to deliver quality professional experiences:

- reduction in teacher workload to allow for time to be spent with the PST in professional conversations, observations, feedback, planning and learner development and outcomes.
- financial recognition of the significant and critical role of the mentor and school
- provision of professional learning opportunities
- provision of appropriate resourcing to the schools and mentors.

Reform Area 4: Improving postgraduate ITE for mid-career entrants

Background to Reform Area 4

ATRA supports the position taken by the Panel in relation to the two-year EFTSL⁷ Masters degree being the appropriate qualification level to provide postgraduate ITE students with the appropriate level of pedagogical, disciplinary, content, and practical knowledge required to be successful in the classroom.

Across Australia, there are a number of flexible and innovative approaches to the delivery of a two-year Masters ITE qualification that enable preservice teachers to enter the classroom as teachers or paraprofessionals while studying, or through an internship arrangement.

One-year postgraduate ITE programs, when combined with a 3-year undergraduate degree, may continue to meet the qualification requirements for teacher registration in Australia, however, the Graduate Diploma is no longer an accredited ITE program.

How can Masters degrees be structured so that mid-career entrants can assume roles in the classroom within 12-18 months instead of two years? What changes to regulatory arrangements are needed to enable this?

Recommendation

No changes are required because the existing regulatory requirements already facilitate this type of approach.

A list of examples of employment-based programs is provided below. Several are supported through state government funding. Consequently, Masters degrees are already being structured in a way that supports mid-career entrants to assume roles in the classroom within 12 months or less through employment-based programs.

Examples of how these programs are structured can be found in Appendix 3 which gives a high-level summary of Victorian employment-based program structures.

These employment-based programs are often facilitated through alternative authorities to teach. As such, ATRA does not foresee any need to change existing regulatory arrangements.

A sample of employment-based programs is provided below.

Deakin University: Master of Applied Learning and Teaching (Secondary) (18-month course)
University of Melbourne: Master of Teaching (Secondary) Internship (2-year course)
La Trobe University: Nexus program (18-month or 2-year course)
Teach for Australia: Leadership Development Program (2-year course)
Australian Catholic University: Master of Teaching (Secondary) (Internship) (2 Year)
Federation University: Master of Teaching (Secondary)
RMIT University: Master of Teaching Practice (Secondary Education)
Victoria University: Master of Teaching (Secondary Education)
Griffith University: Master of Primary Teaching – Turn to Teaching
Griffith University: Master of Secondary Teaching – Turn to Teaching
University of Southern Queensland: Master of Learning and Teaching (Primary)
University of Southern Queensland: Master of Learning and Teaching (Secondary)
Queensland University of Technology: Master of Teaching (Secondary)
University of Tasmania Teacher Intern Placement Program in DECYP schools (pre-service teachers in the final Year of a B ED and in year 2 of the Master of Teaching)
University of Canberra operates an employment-based program for final year Master of Teaching ⁸

⁷ Equivalent full-time student load

⁸ Students can be employed while completing their ITE degrees. The conditions for the permit-to-teach are governed by employer-HEI agreements with caveats on which final year Masters students are eligible, and restricting students to a maximum 60% employment fraction (3 days pw) in one position in one school only, with mentoring and other supports.

It should also be noted that such programs have been less necessary in NSW as teacher education students have the right as individuals to conditional accreditation in the final year of their Master of Teaching allowing them to be employed as teachers while completing their degrees. This has served as a proxy employment-based program and uptake has greatly increased since COVID. Consequently, NESA is encouraging providers to review their program structures to examine if they best support the needs of their teacher education students being in the classroom while studying during their final year. In 2023, the NSW Department of Education will be piloting a program through the pre-existing Master of Teaching degrees of several universities to attract mid-career changers to teaching.

Building the evidence base: would a framework for assessing the success of mid-career programs assist in sharing lessons learned in designing mid-career programs?

A framework may be helpful; however, it is important to note that through the Australian Council of Deans of Education (ACDE), and each jurisdiction’s Deans group, this type of collaboration and information sharing already occurs. Similarly, as outlined above, the ATRA network collaborate and share information about different practices in place in ITE. In addition, TRAs collaborate closely with ITE providers in the development and evaluation of all ITE programs to ensure ongoing adherence to accreditation requirements. Further, a ‘framework’ for assessing the success of mid-career programs already exists in the form of the accreditation Standards and Procedures, and particularly, the evaluation and improvement requirements of Program Standard 6.

Increasing flexibility: is there sufficient flexibility in providers delivery of ITE to cater to the circumstances of mid-career entrants?

Recommendation

ATRA believes there is sufficient flexibility for ITE providers to cater for the circumstances of mid-career entrants.

These flexible arrangements include: The use of summer / winter intensives to fast-tracked program completion; Opportunities to utilise permission to teach or equivalent and allow PSTs to ‘earn while they learn’; and online/blended learning options are the ‘norm at this point in time.

Greater flexibility can be facilitated through additional funding to support the development of programs that are able to cater for circumstances of mid-career entrants.

Programs listed above offer flexibility around delivery options. However, there is an inevitable lack of flexibility around professional experience – ensuring the quality of professional experience (timing, sequencing, length) invariably results in a lack of flexibility in some respects.

As professional experience is a critical part of an ITE program and ensures that PSTs graduate with the necessary skills, experiences, and ability to develop the relational aspects required of a teacher, increased flexibility may not be possible given professional experience is designed to reflect the realities of school routine and time commitments.

Further, the costs associated with innovation and bespoke ITE program design are significant, as is the development and running of internships and employment-based pathways. Funding is required to support the system to cater for the circumstances and needs of mid-career entrants (e.g., time release for mentor teachers, professional learning, recognition of mentor teachers

Appendix 1

Please note the table below provides examples of which APST the core content could be taught, practiced or assessed. It is not an exhaustive list of the relevant APST that can be mapped to the core content areas but provides a list of the most aligned.

Proposed Core Content	Example relevant APST
The brain and learning	<ul style="list-style-type: none"> • 1.1 Physical, social and intellectual development and characteristics of students • 1.2 Understand how students learn
Effective pedagogical practices (explicit modelling, scaffolding and formative assessment)	<ul style="list-style-type: none"> • 2.5 Literacy and numeracy strategies <ul style="list-style-type: none"> ○ For early reading / phonics ○ For explicit mathematical instruction • 3.2 Plan, structure and sequence learning programs <ul style="list-style-type: none"> ○ for scaffolding • 3.3 Use teaching strategies <ul style="list-style-type: none"> ○ For explicit modelling • 5.2 Provide feedback to students on their learning <ul style="list-style-type: none"> ○ Formative assessment
Classroom management	<ul style="list-style-type: none"> • 4.1 Support student participation • 4.3 Manage challenging behaviour
Enabling factors for learning	<ul style="list-style-type: none"> • 1.3 Students with diverse linguistic, cultural, religious and socioeconomic backgrounds <ul style="list-style-type: none"> ○ For cultural responsiveness • 1.4 Strategies for teaching Aboriginal and Torres Strait Islander learners AND 2.4 Understand and respect Aboriginal and Torres Strait Islander people to promote reconciliation between Indigenous and non-Indigenous Australians <ul style="list-style-type: none"> ○ For First Nations peoples, their cultures and perspectives • 1.5 Differentiate teaching to meet the specific learning needs of learners across the full range of abilities AND 1.6 Strategies to support full participation of students with disability <ul style="list-style-type: none"> ○ For diverse learning needs • 3.7 Engage parents / carers in the educative process 1.6 Strategies to support full participation of learners with disability AND 7.3 Engage with parents / carers <ul style="list-style-type: none"> ○ For Family engagement

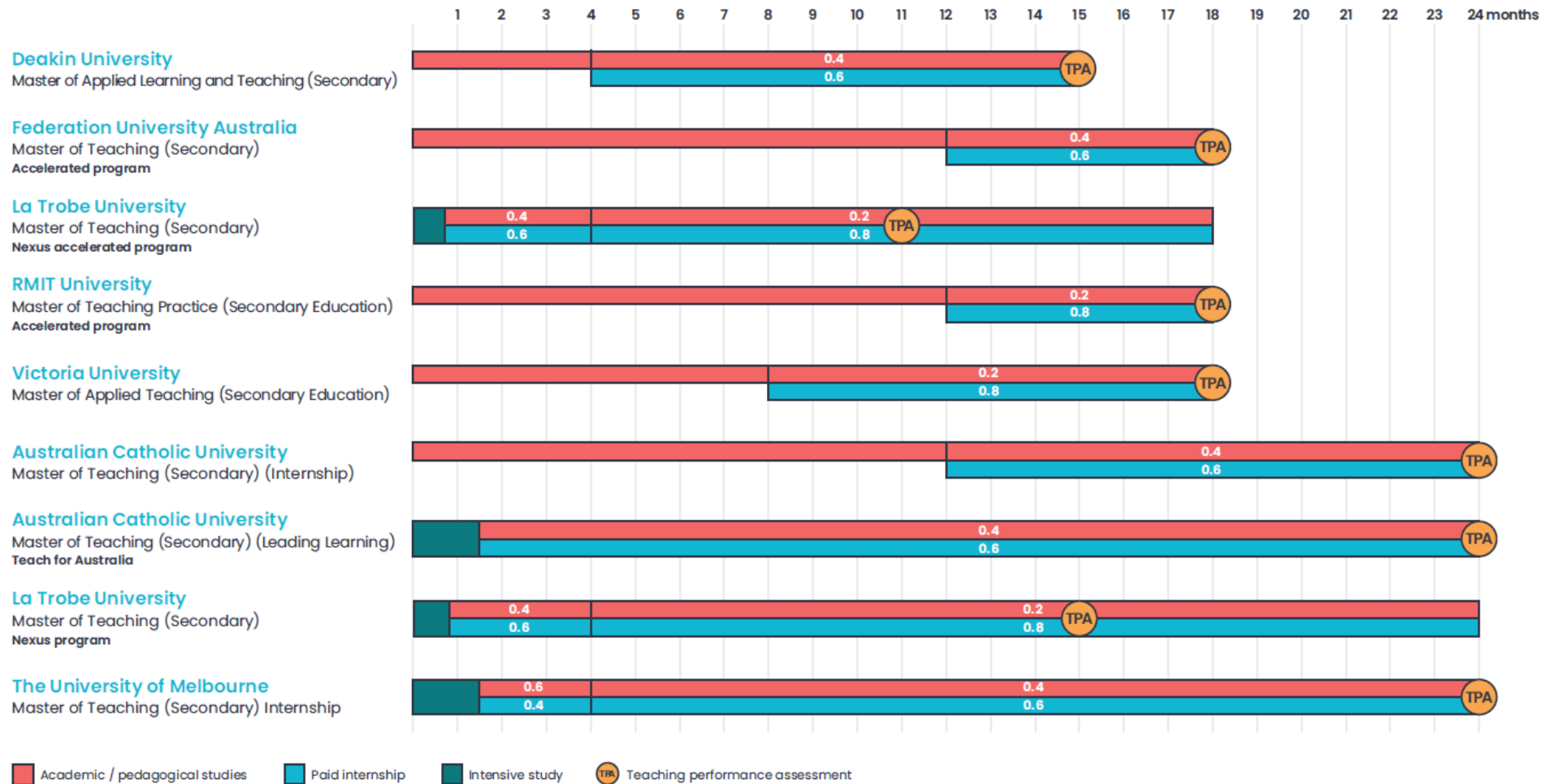
Appendix 2

Program Standard	Possible change	Advantages	Disadvantages	Risks
<p>(Approach 1)</p> <p>Program Standard 1 Program Outcomes – 1.1</p>	<p>Update Template 3 to require ITE providers to address core content against the relevant descriptors of the APST.</p> <p>Specifically, Template 3 can be focussed on the APST directly related to core content (Appendix 1) with specific and clear requirements to meet the core content requirements.</p> <p>For remaining APST, a piece of best evidence is required for taught, practiced, and assessed.</p> <p>Wording of Program Standard 1.1 would need to be updated to require assessment of inclusion of core content, including where it is assessed.</p> <p>Core content elaborations could be included as attachment/addendum to Program Standard 1.1.</p>	<p>Pre-existing template.</p> <p>Alignment of intent - Template 3 is concerned with program outcomes – that all preservice teachers can demonstrate the 37 descriptors of the APST by the end of their program.</p>	<p>The lexical patterning used in the APST descriptors to represent development across the four career stages may make alignment between core content and descriptors challenging, i.e. Descriptor 4.3 focusses on <i>demonstrating knowledge</i> of practical approaches to manage challenging behaviour, whereas the core content foci is on implementation and demonstration.</p> <p>Core content does not accurately/fully align to the APST, e.g., descriptors partially demonstrated meaning content may need to align to more than one descriptor, resulting in significant workload for providers, panellists and TRAs</p> <p>Operationalisation would be complicated because the way the template is currently set up to require full scope of the descriptor to be met.</p>	<p>Core content could become regarded as an overly burdensome compliance issue.</p> <p>Panel focus on accuracy of mapping core content to APST descriptors rather than on the core content itself.</p>
<p>(Approach 2)</p> <p>Program Standard 1 Program Outcomes – 1.1</p>	<p>Create a new template 'Template 3.1 (for example)' that requires ITE providers to indicate where in the program core content areas are covered.</p> <p>Wording of Program Standard 1.1 should be updated to also require separate assessment of core-content, including where it is assessed.</p> <p>Core content is included as attachment/addendum to the Program Standards.</p>	<p>Template focussed on core content results in simple assessment for panels that does not detract or complicate existing template.</p> <p>APST are considered in Template 3, core content in a new Template 3.1.</p> <p>The template could include other core content areas required by the Standards and Procedures thereby simplifying and streamlining accreditation processes, such as the teaching of reading in the early years, which is currently required under 4.2. 4.2 would retain the quantum requirement in relation to the teaching of early years, but content could be diverted to 1.1.</p> <p>Template could require demonstration of where core content is assessed.</p>	<p>An additional template for assessment by panels.</p>	<p>Could be a compliance exercise 'tick and flick' if the template does not include sufficient guidance to require sufficient detail and rigour.</p>
<p>(Approach 3)</p> <p>Program Standard 2 Program development design and delivery – 2.1</p>	<p>Update the wording in Program Standard 2,1 to require the program rationale to demonstrate explicit engagement with the core content.</p> <p>Core content is included as attachment/addendum to the Program Standards.</p>	<p>This approach builds on the existing accreditation requirements by making expectations more explicit.</p> <p>Would not increase accreditation workloads for ITE providers, panels or TRAs significantly.</p>	<p>Misaligned focus may compromise effectiveness, that is, Program Standard 2 is concerned with program design, as opposed to outcomes (which is the focus of Program Standard 1)</p>	<p>May not necessarily lead to authentic and explicit engagement in teaching and learning as rationale and design focus is more informing that implementing.</p> <p>May be more appropriate for Rationale to reflect integration elsewhere, rather than being standalone coverage of the core content.</p>

APPENDIX 3

Internship ITE program timelines

Current programs



Note: Internship ITE programs all have the same study load and number of units, but some utilise trimester models or intensives to reduce the time taken to complete the program.

Internship ITE program timelines

Other programs

Immersive unpaid internship

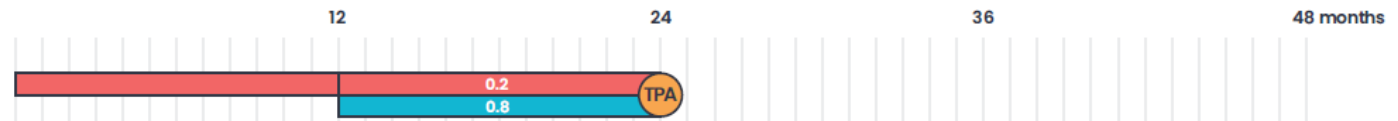
Deakin University

Master of Teaching (Primary and Early Childhood); (Primary); (Primary and Secondary); (Secondary)

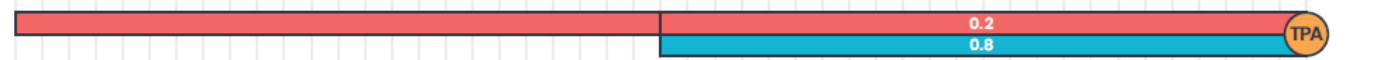


Potential programs

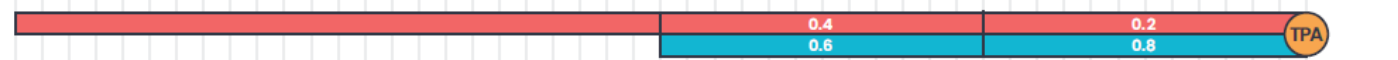
Program 1
Postgraduate program



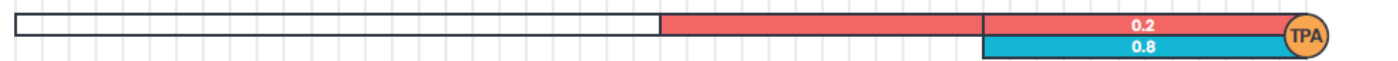
Program 2
Undergraduate program



Program 3
Undergraduate program



Program 4
Undergraduate program



■ Academic / pedagogical studies
 ▨ Unpaid internship (optional)
 ■ Paid internship
 Credit from previous study / employment
 TPA Teaching performance assessment