

RESPONSE FORM

Submission on the draft *National Professional Standards for Teachers*

1. Are you making this submission on behalf of an organisation? YES

2a. Organisation Name:

Independent Education Union of Australia

2b. Submission authorised on behalf of the organisation by:

Chris Watt, Federal Secretary

3. Your name(s):

Chris Watt

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6. Submissions will normally be published. You can finish the response form here if you agree that your submission will be published. However, if you would like your submission to be confidential (i.e. not published), please complete the following:

I wish to make my submission in confidence:

(place an X in the box if you do NOT want your submission published)

The public consultation process on the draft Standards closes on **21 May 2010**.

Further information on how to make a submission can be found at

http://www.mceecdya.edu.au/mceecdya/npst2010-submission_details,30534.html

Forward submissions to the MCEECDYA Secretariat by:

email (**preferred**) to enquiries@mceecdya.edu.au

fax to (03) 9639 1790

or by post marked to:

National Professional Standards for Teachers Consultation

Ministerial Council for Education, Early Childhood Development and

Youth Affairs,

PO Box 202,

Carlton South Victoria 3053.

14 May 2010.

INTRODUCTION

The Independent Education Union of Australia (IEUA) is the federally registered union which represents teachers and support staff in non-government education institutions including early childhood centres, schools and post secondary training institutions, across all the states and territories of Australia. The union currently has a membership of over 66,000.

The IEUA has always taken an active role in the various debates and government funded projects and forums concerned with issues of teacher professionalism, standards and the quality of teaching and learning. In recent years the union has been engaged in further work on these issues through a number of initiatives, including work advanced by the MCEETYA Taskforce on Teacher Quality and Educational Leadership, the Review of Teaching and Teacher Education, the establishment in most jurisdictions, of Institutes/Colleges of Teaching and the Commonwealth sponsored work coordinated by the Australian College of Educators on teacher quality, professionalism and standards.

Through its State Branches, the Union has been actively involved in the professional dialogue and development of teacher standards in the respective jurisdictions.

The IEUA has long supported the development and elaboration of National Professional Teacher Standards in the context of a commitment by governments to address and resource a Quality Teaching Framework.

1. Does the preamble to the Standards give a clear picture of the context for the reason, use and purpose of the Standards?

No

2. Comments to the question above:

The IEUA is concerned about two elements in relation to the underpinning principles that are or need to be made explicit in the preamble.

In the first instance there is a concern that there is a limited understanding or conceptualisation of the notion of ‘Quality Teaching’ that leads to a narrow emphasis on the notion of the singular element of “teacher quality”. The document needs to appropriately reflect the range of factors that impact and influence ‘Quality Teaching’ in schools.

Improving teaching quality (as opposed to assessing the “quality” of individual teachers) must be accompanied by explicit statements about the broader context including but not limited to: :

- An understanding of the importance of resourcing and system support
- An understanding of the collaborative nature of teaching
- A need for statements on standards to be accompanied by properly resourced, collaborative, and teacher directed professional development to build teacher capacity.
- Be built on a foundation of teacher trust and an acknowledgement of professional teacher judgement

The IEUA would draw the Secretariats attention to the work of the IEUA in relation to Quality Teaching which can be found at <http://www.ieu.org.au/214.html>.

In the second instance the IEUA believes that there needs to be a clear understanding that the standards provide a framework that initially provide for minimum entry or licensing benchmarks while at later stages provide for aspirational goals.

In the even that this aspect is not clearly understood by ‘end users’ of the standards framework there will very likely be tension between the professional role of the standards and the industrial rights and responsibilities of parties and in particular teachers.

Current and indeed future industrial arrangements in schools should not be diminished by the development, establishment and implementation of a standards framework. Where such a framework can find a place in industrial agreements or industrial negotiations that should be a matter for the parties.

3. Do the draft Standards describe a realistic and developmental teacher professional standards continuum? (Required)

No

4. Comments to the question above:

Whilst the draft Standards seem to provide for a developmental or increasingly complex, higher order of requirements when moving across the standard through graduate to proficient to accomplished to leader, in many instances the transition appears to be manufactured rather than representing any real difference in behaviour or action on the part of the teacher.

The IEUA would argue that in some instances the core element might be expected of all teachers and any attempt to paint this element as somehow having discernible levels of application is fanciful.

The way in which the draft moves across the various proficiency levels (i.e Graduate, Proficient, Highly Accomplished, Leader) in each (sub-standards) descriptor is often artificial, meaningless and unmeasurable. This is most noticeable in the attempt at differentiating Highly Accomplished from Proficient.

The following descriptors are examples of this :

1.1 A Proficient teacher knows “*how to apply this to their students’ learning*”, and a Highly Accomplished teacher “*applies relevant aspects to their teaching*”. Is this suggesting that the Graduate is applying these aspects in an irrelevant way to their students learning?

2.4 A Proficient “*knows and understands how to communicate with their students to promote understanding of the content being taught*”, and the Highly Accomplished “*knows and understands a range of different communication strategies such as questioning, explanation and discussion to promote understanding of the content being taught*”. The second descriptor is not a description of higher proficiency; it is simply an *elaboration* of the “how to “ strategies that the Graduate would also use.

2.5 The Proficient Teacher “*knows how to organise and sequence the content, skills and concepts ...*”; and the Highly Accomplished “*knows how to select and sequence the concepts, skills and content* The replacement of the word *organise* with the word *select* does not set this at a higher proficiency level.

1.6 The Graduate “*can address the learning needs of all students, including the needs of gifted and talented students ..*”; and a Highly Accomplished teacher “*knows and understands how to determine the interests and learning needs of all their students, including ...*”. This implies that the ability to actually *address* the learning needs of *all students* (stated as Graduate level) would not involve knowing how to determine the interests and learning needs of the student (stated as Highly Accomplished level).

In part this problem could be addressed by the development of a clear conceptual basis for each of the four levels.

It would be useful to have a more fulsome description in the generic descriptions of the four levels, Graduate, Proficient, Highly Accomplished and Lead at the beginning of the document.

This would help to control a reductionist reliance on the specific descriptors as the only way of identifying or demonstrating the level of proficiency in the standard. It needs to be resolved whether descriptors are examples or are they the criteria to be checked off against.

Standards should clarify what it is that a teacher at each level is expected to know and do, and not just add on layers or more descriptors for the sake of appearing to indicate that greater complexity, for instance, actually exists in every single descriptor.

A conceptual basis could be, for example:

The graduate level should describe a teacher in all ways ‘ready for work’, while the capabilities expected at proficiency level should be those of a teacher with some experience who has bedded down, and feels competent about, the aspects of a teacher’s work.

An accomplished teacher will have polished those capabilities, will model accomplished practice and be recognized by their peers as accomplished teachers. Colleagues will seek the advice, mentoring and support of accomplished teachers, who will readily share their expertise with them.

Lead teachers will put their expertise to creative and innovative use. They will lead other teachers in reflective practice and initiate programs to enhance learning. They will identify, develop and may deliver professional learning experiences for other teachers.

5. Do the draft Standards reflect what you would expect teachers to know and be able to do for each of the four levels (graduate/proficient/highly accomplished and lead teachers)?

No

6. Comments to the question above:

Leaving aside the issue of number of standards, need for a unification of some individual standards and the question of broad statements supported by ‘exemplars’ as dealt with in other parts of the IEUA’s submission, the Union has concern about the expectations for evidence that will arise for both the highly accomplished and lead teacher standards.

First there is an excessive emphasis on ‘research’ in these two standards. The document does not indicate why individual teacher research is a necessary component as distinct from awareness of,

critical consideration of and implementation of current research (conducted by others or published by others).

There is no indication of the type of research being anticipated, whether it be 'formal' or 'informal', conducted locally or more broadly, peer-reviewed or any other qualifying statement. 'Research' for its own sake in meeting a 'standards framework' may simply increase teacher workload and narrow the nature of their classroom activity and engagement.

Second, the IEUA is concerned that some standards, for highly accomplished and, in particular, lead teachers would require these teachers to have 'authority' or adequate 'flexibility' in their directed work that would in many instances only be available to teachers acting in promotion positions.

The use and purpose of Lead Teacher is a major problem, as the way in which this proficiency level itself and the various descriptors under each standard are framed and described, reveals a mixture of actual job descriptions of particular Positions of Responsibility (Co-ordinators) in specific school organisational areas and at other times general proficiencies that the Accomplished teacher, or indeed the Proficient teacher, would have.

As the standards are intended to be accessible to all classroom teachers irrespective of their assigned responsibilities there is a concern that some standards can only be demonstrated if the individual teacher can make particular decisions and undertake particular tasks from a position of authority. This could certainly relate to authority to act to undertake 'local research' and to act on any findings. Opportunities to undertake certain learning strategies/styles in the classroom can also be influenced or controlled by more senior staff.

The IEUA would anticipate that the validation of the standards examines the fundamental question of the authority or capacity of the classroom teacher, not in a promotion position, to be able to provide an example(s) of evidence against particular standards.

7. Are there other descriptors the draft Standards should include?

No.

8. Comments to the question above:

The IEUA is concerned that there are already too many standards' descriptors. Whilst mindful (as per the following set of questions) that there is an intention to provide 'substantial support materials' the IEUA believes that there is a need to recast the document to provide an overarching conceptual framework that provides a holistic description of the 4 levels, to recast the current standards' descriptors to i) deal with overlap and elements of repetition and ii) to be more general in nature.

The IEUA does not believe that the standards' descriptors as provided should be the basis for the evaluation of teacher practice. Indeed, this runs the very real risk of the standards becoming little more than a check-list.

The support materials should provide for elaborations or 'exemplars' of the standards and it is these that should be the evidence guide. The IEUA notes that the work on this aspect requires careful description to avoid the notion that all such elaborations or exemplars would need to be met, but

rather than certain behaviours, activities, practices of the teacher would be 'evidence' of the standard being considered.

In considering a more generalised construct of the current draft standards the IEUA would encourage development of clearer statements of the team approach to teaching and learning that is fundamental in schools and that reflects engagements with other colleagues, other professionals, parents and the wider community. The current standards are arguably too individualised and suggestive of an isolationist approach to quality teaching.

In a comment above we stated that there were already too many standards. The IEUA believes that there is overlap between many standards and many are in fact repetitive.

The IEUA believes that that considerable work needs to be undertaken in relation to the conceptual organisation of the framework.

The explanations of the 3 Domains of Teaching are not well fleshed out and this results in an overreliance on descriptors to provide the "content" albeit in a fragmented and selective way. By way of example, the NSW Teaching Standards have the same Domains and provide a more fulsome version of this draft's summary version. The draft should further elaborate the Domains, such as is done in the NSW descriptions

The key ideas/areas/skills elaborated in these 3 Domains should and could then be more clearly linked to the organising structure of the framework. In the NSW standards, this seems to be achieved successfully by having an additional column called 'Aspects' which are really the key "content" areas of the Standard. For example, under the Standard *Teachers know their subject content and how to teach that content to their students*, the NSW framework's 'Aspects' column spells out the various key aspects i.e. knowledge of curriculum, knowledge of pedagogy, knowledge of curriculum.. . The 'Descriptors' then elaborate what this looks like under each of the proficiency levels.

Organisationally, the 'Continuum Concept' doesn't work well as a framework to be used to illustrate a developmental continuum because it is essentially built on what is often tinkering with a wording difference here and there between the Graduate – Proficient – Highly Accomplished levels, or adding a sentence such as "*shares with colleagues*" to the Highly Accomplished descriptor, implying quite incorrectly, that this is a feature of higher proficiency and that Proficient teachers would not be doing the same.

The model used in the Professional Standards for Teachers in England provides a more constructive approach for a framework. Like the NSW standards, the UK Professional Standards for Teachers break down the 3 bigger organising ideas, e.g, Professional Knowledge - into key areas/aspects, and then elaborate what these mean/look like at the particular proficiency level.

A key difference in the structure is that the UK Standards do not keep repeating the particular Aspects and Descriptors for each proficiency level. They progressively take a descriptor as read, so to speak, for a higher level and just elaborate a higher description or additional descriptor for the higher proficiency level.

This results in the Graduate standard having 33 descriptor statements, the Core (Proficient teacher) having 41, the Expert Teacher 5 additional/differently graduated statements, and for the AST a further 3.

9. Remembering that there will be substantial support materials, will it be possible for educators to use the standards to evaluate teacher practice?

No.

10. Comments to the question above:

In relation to teacher evaluation, the IEUA supports collegial assessment mechanisms that take a holistic qualitative approach, based on peer appraisal and backed up by supportive pathways to ongoing improvement and acknowledgement of achievement.

As outlined above (Q8), the IEUA believes that there is a need to re-draft the current standards to provide a more holistic description and that the 'support material' include elaborations or 'exemplars' of the standards and it is these that should be the evidence guide to evaluate teacher practice.

11. If you would like to expand on your answers, or have additional comments, please enter them here:

The IEUA welcomes the commitment to psychometrically validate the standards with the teaching profession to ensure the standards are an authentic and accurate reflection of their actual work. It will be critical to ensure that teachers are genuinely engaged in this necessary stage.

Further, commitment of resources needs to be made to ensure that a wide range of teachers are able to engage in discussion about the draft standards and that this dialogue is able to be undertaken during school hours.