

NATIONAL PRE-SERVICE ACCREDITATION GUIDELINES

An AEU response to the
AITSL consultation paper

AEU Victorian Branch

Submission paper

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National Pre-Service Accreditation Guidelines AITSL Consultation Paper

AUSTRALIAN EDUCATION UNION (VIC) SUBMISSION

This submission highlights the issues and concerns the AEU (Vic) has with the AITSL consultation paper – *National System for the accreditation of pre-service teacher education programs*. We either support or have a neutral attitude to those parts of the paper which we do not comment on. Our submission starts at the beginning of the consultation paper and comments on each section in turn.

Introduction (p.2)

- It is important that a national system for the accreditation of pre-service teacher education programs should incorporate early childhood courses. A number of universities in Victoria offer dual primary-early childhood programs which qualify graduates to teach in both sectors. Excluding early childhood from the national system creates artificial divisions between the sectors, adds unnecessarily to the paperwork involved in course accreditation and leads to gaps and inconsistencies in the data about course quality, graduate outcomes and teacher supply. A concrete time-line should be set for the incorporation of early childhood pre-service teacher education programs in the national accreditation system.

Graduate Teacher Standards (pp 9-14)

- While the graduate teacher standards are a sub-section of the larger national professional standards, this is the first time these revised standards have been published. The concerns we identify relate to specific graduate teacher indicators (in the focus areas of the standards). We believe they should be amended before being used in the accreditation processes for pre-service courses.
 - Standard 1.3 – “Demonstrate knowledge of teaching strategies that are responsive to the learning strengths and needs of students from diverse linguistic, cultural and **religious** backgrounds”. The inclusion of ‘religious’ backgrounds is inappropriate. How will information about the religious background of students in a secular public school system be elicited? How are teachers in public schools meant to use such information even if it was made available? The term ‘religious’ should be removed. If graduates wish to teach in a faith-based school the school itself should provide relevant religious information. While students who are enrolled in a faith-orientated higher education provider may receive some instruction on this matter relating to their own religion, the bulk of pre-service teacher education is provided in secular public universities which should not be required to ensure that their students achieve a mandated graduate standard in this area.

- Standard 6.1 – “Demonstrate an understanding of the role of the National Professional Standards for Teachers in identifying professional learning needs”. The generic focus for this indicator is “Identifying and planning for professional learning needs”. This should be about the capacity to identify/plan professional learning needs using a range of sources, not about enhancing the role of the National Professional Standards. They are just one source which graduates could refer to when they undertake the process of identifying their professional learning needs. This is another unfortunate example of an inward-looking bureaucratic approach which was also present in the original National Standards consultation paper from AITSL.
- Standard 7.4 – “Understand the role of external professionals and community representatives in broadening teachers’ professional knowledge and practice.” The generic focus for this indicator is “Engage with professional teaching and broader communities”. The indicator should include “professional organisations”, as almost all graduates have some form of contact with professional organisations (including unions) either during their university course or in the years following their graduation. Professional organisations play a key role in broadening teachers’ professional knowledge and practice. Graduates should have an understanding of their role by the time they are ready to work as teachers.

Program Standards (pp 15-19)

- Standard 3 - Program Entry Requirements
 - 3.1, 3.2 - The requirements for program entry are unclear in the way they are expressed in these sub-sections. The first dot point in 3.1 states that students from Year 12 must have achieved at or above the 70th percentile in English (primary and secondary teacher education programs) and Maths (primary programs) before they can be admitted to a course. The second dot point involves entry below this ‘requirement’ and therefore, as it is written, seems to contradict the statement that the first dot point is a “requirement”. 3.2 repeats this confusion by implying that only the first dot point in 3.1 is a ‘requirement’. These sub-sections need to be re-written so that it is clear that the 70th percentile is not a requirement for entry but an indication of a literacy and numeracy standard seen as appropriate for people entering an undergraduate teaching program. Any ‘requirement’ for an achieved ‘proficiency’ in English and Maths should be linked to a standard to be achieved ‘on graduation from the program’. The standard which is set should be based on valid research identifying the level of proficiency in these areas needed to be an effective teacher rather than something as amorphous as ‘the 70th percentile’.
 - Course entry requirements should be such that they enable all universities to have a mix of students from different social backgrounds as part of their student profile. Research from several Victorian universities has shown students from public secondary schools on average do better than their non-government school peers (who received the same ENTER score) by the end of the first year of their university course. Having a hard, and possibly inappropriate, barrier at the beginning of an undergraduate program runs the risk of excluding some low SES candidates who would make good teachers and be able to reach a necessary level of proficiency by the end of their course. This would also fly in the face of the recommendations of the Bradley Report into higher education, supported by the Federal Government, to have a broader cohort completing university education.

- 3.4 – We support the requirement of an IELTS score of 7.5 upon graduation for students admitted to programs on the basis of an International English Testing System (IELTS) assessment. From our experience of running courses (with Deakin University and the Department of Education and Early Childhood Development) for international teachers seeking to teach in Victorian public schools we would support an IELTS score of 8 upon graduation for the spoken English component.
- Standard 4 - Program Structure and Content
 - 4.1 - A clear and detailed rationale needs to be provided for something as important as mandating two year full time courses for graduate entry programs. In what ways will the two year courses add significant value to the preparation of teachers currently doing one year Diploma of Education programs? Will the two year courses in reality be the same program spread over two years? These sorts of questions need to be answered before any decision is made to mandate two year courses. The consultation paper does not contain a clear rationale for change.
 - There are a number of concerns about any move to mandate two years for all post-graduate courses. The introduction of this measure is likely to cause a teacher supply problem in a number of teaching areas as graduates take two years rather than one to qualify. There are financial implications and social equity considerations for students having to complete 5 years of tertiary study. There is also an anomaly created when non-graduate entry students are able to qualify with 4 years of tertiary study. This requirement will particularly affect secondary teacher education students where most students do a 3+1 course rather than a 4 year education degree. Secondary is also the sector where teacher shortages are most likely to occur. If it is decided to mandate two years it should be introduced in a staged fashion over a long time frame.
 - 4.3 – ‘Middle school setting’ needs further definition. It seems to be a primary plus option. P-12 settings are not mentioned. This standard should be more detailed to cater for the range of possible options.
 - There is no reference to programs for teaching in special schools. While there are complexities in this area eg some programs are designed for existing teachers rather than pre-service students, there are pre-service programs which focus on special schools (which may be primary or secondary or a combination of both) and the accreditation standards should separately acknowledge courses in this area.
 - Standard 4.7 – This would need to alter if 4.1 – the two year graduate entry option - was not mandated.
- Standard 5 - School Partnerships
 - 5.1 – Establishing “enduring school partnerships” is more of an ‘aspirational’ standard than a description of the way the school placement process works in metropolitan Melbourne. While such partnerships are certainly worth supporting they need to be seen in the context of a marketplace approach used by universities (at least in Victoria) to obtain school placements. Most schools are contacted many times by a range of universities competing against each other to obtain placements for their students. Some universities have more resources than others to offer schools. Some universities use tactics to exclude others from certain schools.

Greater cooperation between universities would benefit the practical professional experience of students and could increase the willingness of schools to provide placements. AITSL should consider how this can be encouraged.

- 5.5 – The third dot point which requires supervising teachers to have undertaken “a nationally recognised training program on the graduate teacher standards” is completely impractical and, if enforced, would create a crisis in placements for teacher education students. There is already a major shortage of placements. This is particularly acute for international students. The system would grind to a halt if this requirement was implemented in the foreseeable future. You would need a very long time frame to try to make this requirement work. PD programs for the standards could be offered, and seen as desirable, but they cannot be mandated. Other issues relate to what sort of training would meet the needs of all the different contexts and all the different teacher education programs and who would provide it.
- There is no reference to ‘internships’ which are forms of supervised/mentored semi-independent teaching practice over an extended period of time used in a number of accredited pre-service teacher education courses in Victoria and other states. Will internships continue once the new national guidelines are implemented? If so, it would seem to be sensible to provide a basic framework within which these programs should operate.
- Standard 6 - Program Delivery and Resourcing
 - 6.1 – The AEU supports this proposal about HE provider staffing, but there needs to be further detail about what is meant by: “including an appropriate proportion who also have contemporary school teaching experience.” What is an “appropriate proportion” (for example in percentage terms – 20% or 30%) and how “contemporary” does the school teaching experience have to be (this year, the previous year, within the last three years)? We support the concept of a significant proportion of the teachers of teachers having contemporary school teaching experience but believe that there needs to be specific detail about each element of the proposal to ensure that this part of the standard is actually implemented.
- Standard 7 - Program Information and Evaluation
 - 7.2 requiring universities to provide data for workforce supply purposes is important so that there are some clear links between teacher supply (through enrolments in the different pre-service courses and teaching methods within those courses) and teacher demand.

National Accreditation Process (pp 20-26)

- Accreditation Panels
 - The issue which is not addressed in this section is the costs involved (additional to the present system) and who is expected to pay for the new accreditation process. This includes the requirement to undertake a nationally consistent training program and the need to bring in someone from interstate for each accreditation panel. We would be concerned if this cost burden was placed upon the member-funded Victorian Institute of Education. The Federal Government should provide funding to meet the costs involved in implementing the new national accreditation system.

- Quality Assurance and Continuous Improvement
 - It is important that stakeholders are part of these processes. They should be asked to provide feedback about the operation of the system and consulted about any proposed changes.

Implementation Timeline (p 27)

- The timeline for submissions on the consultation paper is far too tight. The paper was released on September 6 and the deadline for submissions is September 24. One week of this period is a school holiday break for Victorian schools. There are also a range of other consultations going on at the same time. The shorter the consultation period the more people have the impression that AITSL is going through the motions rather than seeking genuine feedback which will be used to amend or substantially change the proposals in the paper. For membership-based organisations like the AEU the short timeline does not allow us to go through an appropriate consultation process with our members before completing our submission. AITSL consultation processes should be designed to enable quality feedback and be as inclusive as possible rather than giving the impression that their major purpose is to meet bureaucratic timelines.



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