



## **Submission to the Statutory Review of the Teacher Registration Act 2012 (WA)**

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**This response to the Statutory Review of the Teacher Registration Act 2012 (WA) is prepared on behalf of the Australian Secondary Principals Association (ASPA) and the Western Australian Secondary School Executives Association (WASSEA).**

WASSEA and ASPA understand and concur with the need for the TRB WA and the importance of having teachers registered through a non-partisan body that operates across sectors. In principal we have no argument with the broad objectives and functions of the Board.

### **Fitness and propriety**

There is no doubt that educators in Australian schools must have a current WWC card and criminal screening and these must remain pre-requisites for holding and maintaining registration. Not holding a current WWC card or having an application in place should result in immediate suspension of the right to be in a school.

### **Full and provisional registration**

Our associations are of the view that for the most part strict English requirements are necessary to teach in Australian schools. The English speaking and writing requirements to live and work in Australia are not necessarily of a high enough standard for teaching in Australian schools. A high level of spoken English in particular is important and in general we advocate for a university level literacy test. An exception to this in a time of skilled teacher shortage might be for language teachers, who are proficient in the language they are teaching but less skilled in English. In such a case these teachers should not be

registered to teach outside the LOTE area. Other exceptions could be argued for teachers from a VET / industry background who apply for a limited registration. It is necessary to have enough flexibility in the registration process to allow for a case by case review to be made in exceptional circumstances.

### **Process of transitioning to full registration**

ASPA and WASSEA agree with the current requirement for registration and that it is important to have registered teachers teaching in schools, however the process of transitioning to full registration is both cumbersome and a time impost on individuals and schools.

In particular when moving from provisional to full registration the process is clearly articulated but cannot always be enacted. Some schools (especially small and remote schools) might not have an experienced mentor and schools can find it hard to release teachers/mentors for blocks of time in order to meet the requirements. In addition many country schools have a large turnover of teachers and have a high percentage of graduates – the workload for school leaders in relation to TRB requirements in these schools is very large. In large metropolitan schools there can be a similar problem, because although there may be more staff there are also likely to be more teachers requiring mentoring. Since the 0.1 release time for level 3 classroom teachers has, for the most part, been removed in government schools the workload now largely falls to people without release time and this has become an impost on their workload. The danger here is that the process is not followed well or that there are no mentors willing to take on the task.

While it is important for school leaders to have the final say in whether a teacher is fit to move from provisional to full registration, ASPA and WASSEA members are concerned at the amount of work placed on school leaders when completing the final stages of the transition. The workload implications are huge and unwelcome. Consideration should be given to a more staged or streamlined process that spreads the workload and doesn't result in a 'cookie cutter' type response due to time restrictions.

Another issue raised by members relates to teachers who travel between schools taking up periods of relief. They are essential to the system, but as they are not usually in any one school for an extended period, the principals are unable to make a fair judgement of the evidence provided because much of it will not relate to their school. Additionally there are relief teachers who take up blocks of work (such as a term relief of LSL) but even that does not necessarily allow the school to make a fair and accurate assessment of their suitability or allow time to guide them through an adequate upskilling and mentoring process.

An example is cited by one of our members. The principal was concerned because although they had not agreed to sign off on full registration for the teacher after one term of relief (not enough evidence was the reason noted), the teacher went independently to the TRB WA and was judged proficient. This is a very problematic. How can a person from the TRB WA who does not know this person's teaching capability and has not worked with them in an extended school based scenario make such a judgement call?

On the flip side, relief teachers are quite disadvantaged because of the TRB WA requirements. There is no easy answer.

### **Definition of teach', 'educational programme', 'educational venue' and ramifications for full registration**

ASPA and WASSEA believe that the current definitions of educational programme, and educational venue are too narrow. There are many experienced, qualified teachers who are employed by or work with education providers such as Department of Education WA and Catholic Education, who are not directly housed in a school but do directly work with teachers and school leaders and directly influence the work of schools and the delivery of the curriculum. The definition needs to be widened to allow for these people to maintain full registration while working out of the school environment. We believe it is not appropriate for such people to be classified as 'non –practicing' when clearly their work is directly affecting student outcomes. In many cases these appointments are less than five years and the current conditions are sufficient, however as soon as a person reaches the five year mark they are affected negatively.

### **Renewal of registration**

The renewal of registration process needs to be streamlined. While it is important to maintain the integrity of the registration, it is easier to get a renewed passport, driver's licence or Working with Children check. Why do we need to prove who we are each time we re-register? With the other processes the invitation to re-apply is the identification check and the photo ID on file is re-used so there can be no fraud. In addition, the current requirement to send in a certified copy of ID documents worth 100 points is a problem in this day and age. People are sending valuable ID information through the mail or internet and that is subject to both fraud and identity theft. We believe that the TRB should investigate other processes that are operating more efficiently and perhaps introduce a photo ID card.

### **Fees**

In relation to the fee for registration, we have no objection as long as it is imposed on a cost recovery model. Further to this, there must be consideration to streamlining processes, making the registration and re-registration processes less cumbersome and an open and transparent accounting back to members of expenditure so they can understand the costs involved in running the TRB WA. Currently many members do not see the value in the fee other than it registers them to teach in WA and ensures accountability to teacher quality and suitability (WWC and criminal screening requirements).

Another consideration, which would also cut administrative costs for the TRBWA, is to charge a five yearly fee payable on registration or re-registration. This would operate similarly to the WWC card and passport processes whereby:

- The fee is not refundable if you breach the conditions of holding registration and it is withdrawn
- Annual invoicing and fee collection is removed
- The issuing of a photo ID card could be incorporated at no extra to the current cost
- There may even be savings in operational costs to pass on to members.

### **Accreditation of initial teacher education programmes**

ASPA and WASSEA reserve comment on TRB WA being involved in initial teacher education programmes and encourage TRB WA to be involved in discussions around national initiatives being undertaken as a result of the TEMAG recommendations.

### **The Board**

We note that the current make-up of the Board is acceptable but also note that it is important that teacher representation remains in place. Consideration could be given to the spread of teacher experience and expertise to ensure both breadth and depth in Board composition. The fact that the Minister has no direct decision making role should also remain in place although it is also important to ensure that while the Board members are appointed by the Minister, there is no real or perceived conflict of interest.

### **National consistency**

ASPA and WASSEA support a nationally consistent approach to registration that at the very least has similar categories and requirements to be met. It would also be sensible to have similar registration renewal periods. At the moment inconsistencies allow people to gain registration in one state and transfer to another without necessarily meeting the requirements of the other state. A good example is people in positions like association or union presidents/representatives or even those working in central office for a time. Our current legislation requires such people to move to non-practicing registration even though they are clearly in their positions because of their teaching experience and expertise. The Victorian Institute of Teaching (VIT) position (below) is more sensible and we advocate that TRB WA adopt a similar position.

*Educational leaders may not be teaching but their work will directly influence teaching and learning in educational environments. They are creating the environment for the teachers they are working with to enable learners to learn.*

*Educational leadership may involve such things as:*

- *Providing leadership in a school or early childhood service*
- *Developing resources and materials for use by teachers in schools or early childhood services*
- *Research into teaching and learning and the dissemination of that knowledge to teachers and/or other educational leaders*
- *Policy development to support and improve teaching and learning*
- *Working with teachers, either individually or collectively to support and improve their professional knowledge and practice.*

*Teachers working as educational leaders may have leadership roles in schools or early childhood services but could be working:*

- *In a regional office*
- *In a local council or kindergarten cluster group*
- *In an organisation providing services and/or support to schools and early childhood services*

- *In an education union such as the AEU or IEU*
- *With the DET, VCAA, CEO or ISV*
- *With a professional teaching association*
- *Undertaking research into teaching and learning or education related issues*
- *As an educational consultant or as a leader in the area of teacher professional development.*

### **WA TRB participation in the Australian Teacher Workforce Data Strategy**

ASPA and WASSEA support the Australian Teacher Workforce Data Strategy (ATWD) and its purpose to provide a comprehensive, national database of registered teachers and students undertaking initial teacher education (ITE) programs in Australia.

In discussions with AITSL (who is responsible for implementing the strategy) we understand that the ATWD will not track teachers individually, but will look for trends in teacher supply and careers across the entire Australian teacher workforce. We are assured that all data will be secure and anonymous. Any reports based on the data will report on aggregate data trends only.

**The current Teacher Registration Act 2012 (WA) does not permit the TRB WA to provide teacher workforce data to the ATWD** and we would urge that amendments be made to ensure that the TRB WA is able to fully participate in the ATWD and contribute to this important, national body of work.