

6 November 2017

WA Teacher Registration Act Review
Attention: Mr Terry Werner
Department of Education
151 Royal St EAST PERTH WA 6004

TEACHER REGISTRATION ACT REVIEW

Dear Mr Werner

I write to you to table my submission re the Review of the Teacher Registration Act.

I preface responses to topics identified in the *Information Paper and Call for Submissions* with an account of my experiences regarding TRBWA operations and functionality.

The *Teacher Registration Act 2012* and the TRBWA's implementation of its policies and procedures have had dramatic and detrimental impacts on my 22+ year career as a teacher and my current livelihood. Specifically, the non-inclusive and prejudicial wording of the *Teacher Registration Act 2012*, related policies and regulations precluded my renewal of full registration.

The *Teacher Registration Act 2012*, related policies and their rigid implementation do not account for the diversity of teachers' circumstances in the modern workforce. Equity, inclusivity, diversity, creativity, being proactive, productive and prosperous are keystones of the *Australian Education Act 2013*; if these ideals are to flourish in our students and schools, they must be modelled throughout the education system and our communities. Failure to embrace inclusive, equitable language and codes and failure to retain experienced educators in the teaching profession has significant negative consequences for the individual teacher, the teaching profession and ultimately, students. This is certainly not in the "best interests of WA children."

In my last period of full registration, whilst on parental leave, I engaged in significant professional development and diligently attended to all seven standards of the *Professional Standards for Teachers in Western Australia*:

- completed a Master of Education
- wrote papers for publication (with AITSL Standards' focus)
- completed 2 semesters of active teaching (which included planning and preparation of teaching resources, implementing set curriculum using a variety of teaching and learning strategies and administering, marking and grading student assessments) and
- completed approximately 100 hours of professional learning as per my online professional learning file.

The TRBWA however, ruled in strict accordance with the *Act*; my application for renewal of full registration did not meet the *Act's* requirements re professional standards. A ruling which impedes an experienced, dedicated educator's continuing contribution to our education system, does not align with the TRBWA Board's commitment to "make the best interests of children its paramount consideration in all decision-making."

Significant amendments are needed to ensure fair, effective and appropriate regulation of the teaching profession.

Topics identified in the *Information Paper and Call for Submissions*:

Who must be registered?

- *the significant definition: ‘teach’, ‘educational programme’, ‘educational venue’*
- *the list of prescribed curriculums*

The Teacher Registration Act (2012) includes “any other place prescribed as an educational venue” in the Terms used section (Part 1, Section 3). The Teacher Registration (Accreditation of Initial Teacher Education Programmes) Regulations (2012) identifies the University of Notre Dame as an “education provider” (Part 1, Section 3) and it is listed as an accredited education provider on the TRB website. Yet tertiary institutions, such as the University of Notre Dame, are not recognized as suitable venues for professional engagement requirements.

Delivery of a set / accredited curriculum (which includes planning and preparation of teaching resources, implementing set curriculum using a variety of teaching and learning strategies and administering, marking and grading student assessments), is a worthwhile professional engagement experience. This level of engagement is certainly not reflected in all engagement scenarios used for reregistration purposes. For example, the planning/preparation and marking/grading aspects, are not mandatory experiences for relief teachers. Yet, relief teaching is an acceptable example of professional engagement.

- Therefore the definition of ‘teach’ should be amended to

To teach means ‘to undertake duties in an educational venue that include – (a) the delivery of an educational program designed to implement **an accredited or** prescribed² curriculum and the assessment of student participation in such an educational program;

- The definition of ‘educational venue’ should be amended to include accredited tertiary institutions (enabling teaching in a tertiary setting to be recognised as a valid professional engagement opportunity).
- The list of prescribed curriculums should be amended to include accredited curriculums at educational venues.

Non-practising registration

- *the label ‘non-practising registration’, particularly as applied to those who have returned to teaching*
- *the limit of two years within which a person with non-practising registration who returns to teaching is required to meet the professional standards*

‘Non-practising registration’ is an inappropriate and inadequate term. For example, it fails to recognise individuals who take a period of leave yet continue to learn and develop their knowledge regarding implementation of education knowledge and skills ie. teachers who are in fact continuing to ‘practise’ and develop their craft.

Additionally, the requirements for returning from 'non-practising' to full registration again, are inordinate. They fail to recognize an individual's experience and expertise; taking leave does not dissolve years of teaching experience. Indeed, teachers who pursue professional development on furlough can return to the profession with epiphanic educational vigour.

The limit of two years imposes work conditions (eg. number of days of engagement) which conflict with individuals' work choices (eg. affects my ability to fulfil role of primary carer of my children).

- With reference to educators who do not fall within the full/provisional/limited categories, the non-practising category should be replaced by a number of categories which address the diverse circumstances and situations of today's educators;
- Requirements for returning to full registration from these categories should therefore, vary according to particulars of said categories;
- 2 years may serve as a nominal timeframe, but there should be provision for extension that accommodates an individual's work choices.

Renewal of registration

- *the renewal of registration requirements*
- *whether there should also be an extenuating circumstances exception for failing to satisfy the professional engagement (i.e. minimum number of days teaching) requirement for renewal of registration*

Teaching is a culmination of knowledge, skills and expertise; educational best practice touts a holistic approach. Teacher registration should therefore, be treated accordingly.

Furthermore, the rigid requirements for professional learning and engagement do not allow educators to exercise professional judgement re pursuit of professional development.

- Registration requirements re professional engagement and learning need to have more flexibility to account for individuals' diverse circumstances, professional interests and/or situational (school/community) requirements;
- For example, the type and scope of professional learning may reduce the opportunity and therefore, requirement of professional engagement;
- An option for extenuating circumstances re professional engagement requirement should be included.

The Board

- *the Board's functions and duties*

Teacher registration legislation going forward, needs to incorporate the ability to investigate matters that do not fall within set parameters; reactive and complaint-based amendments may fail to address all possible eventualities.

Review of the Board's decisions

Each of the Board's decisions on registration outlined in this chapter is reviewable if the applicant or teacher is dissatisfied with it. The review is initiated by the aggrieved person in the State Administrative Tribunal (section 124). No-one affected by a decision of the Board has yet applied for a review by the State Administrative Tribunal.

The process and fee involved with pursuing a review with the State Administrative Tribunal are very strong disincentives. The \$465 (minimum) fee to lodge an application for review was an effective deterrent to me, particularly considering my impacted earning capacity due to refusal of renewal of full registration.

- Facility for review of individual cases should be included in the Board's functions and duties.

I look forward to the Teacher Registration Act review outcomes addressing these issues to enable fair, logical and appropriate ruling on registration requirements and the enacting of retrospective legislation.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Maria Doolan'.

Maria Doolan