



Mr Mike Brady
Project Manager
Teacher Registration Project
Department of education and Training
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Dear Mr Brady

Joint AEU/IEU Submission on Teacher Registration in the ACT

We are writing to you on behalf of the ACT based education unions to provide our comments on the discussion paper concerning the registration of teachers in the ACT.

We recognise that it is unrealistic to expect that the ACT, alone among the State and Territory jurisdictions across Australia should maintain the status quo and not implement procedures for the registration of teachers working in primary and secondary schools in the public and independent sectors. We note that within the public sector there has been a limited form of recognition of qualifications, but that arrangements for the non-government sector have been rather less formal. We note also that it is and has been the practice for several years in both sectors to undertake police checks of teachers working in ACT based schools.

The Unions recognise that the community has a real need to be assured that the teachers employed in all ACT schools are appropriately trained and possess the qualifications necessary to educate their children. In the absence of teacher registration arrangements, it is difficult for Government to provide these assurances.

The Community Discussion Paper recognises that there are a range of possible approaches to teacher registration ranging from taking no action to establishing a body with broad functions going beyond registration of teachers to include development and delivery of professional development, reviewing policies on registration, regulating professional conduct, developing and improving the quality of teacher training programs, etc. As mentioned above, we do not consider taking no action [Model 1] to be a viable response by Government. Not only is Government at all levels committed to implementation of teacher registration in all jurisdictions, but having set up the Reference Group and conducted the community discussion, it would not be politically acceptable to take no action at this stage.

Given that teacher registration arrangements are likely to be established in the ACT, the issues for consideration by Government must go to the sophistication of the body to be established and the range of functions it will be charged to undertake.

In reaching its decisions in this regard, the Unions believe it is vital for Government to take into account the following considerations:

- The relatively small size of the pool of teachers working in ACT schools [a little over 4.0% of the corresponding workforce in NSW and 2/3rds of the size of the Tasmanian pool];
- The financial constraints on the capacity of teachers to contribute to the cost of the authority ultimately decided upon;
 - Whether existing teachers would be grandfathered in to the arrangements.
- The capacity of ACT Government to fund the body established, particularly if its functions extend beyond mere registration of teachers;
- The contribution that employers, both Government and non-government should be required to make to the cost of establishing and operating the authority;
- The additional establishment and recurrent costs involved in broadening the functions of the authority beyond registration to include extra activities [for example, the extra marginal costs of assessing teacher training courses offered by ACT based tertiary institutions or developing and or delivering professional development];
- The financial contribution tertiary institutions might make to the cost of undertaking an assessment role for teacher training courses;
- The scope for buying in the expertise of teacher registration/accreditation bodies in other States and territories where this can deliver cost savings to the body established in the ACT;
 - The Unions do not consider contracting out these functions to be a realistic option, given the responsibilities of the ACT legislature for activities undertaken in the ACT.

Attached is a brief paper prepared for the Reference Group which looks at some of the financial considerations we believe are implicit to any assessment of the type of teacher registration body to be set up in the ACT.

In this regard, it is the Union's submission that whatever body is established,

- It should be established on a statutory basis;
- It should be established to be responsible to the Minister and should be independent of the Department in legislative, reporting and budgetary terms [recent experiences with the BSSS underline the need for the new body to be independent of the Department];
- The body to be established should be based on Model 3 – an independent body with limited functions;
- Seed funding to set up and staff an office physically separate to and independent of the Department is required;
- Given that teacher registration is being undertaken to meet the perceived needs of the community, the community, in its representative capacity as Government,

should underwrite a substantial part of the recurrent operational costs of the new body;

- If the functions extend beyond teacher registration in a reasonably basis form, this becomes particularly necessary [for example, teachers undergoing teacher training are required to meet the HECS levy for their training – to impose on them additional costs for the assessment of these courses is unreasonable and means they are underwriting to the cost of their training both while receiving it and for the rest of their employment.
- The cost impact of teacher registration should be minimised for both new and continuing teachers and should not exceed the average costs that apply in other jurisdictions;
- Any body that is established should be set up in such a way that mutual recognition of teachers' registration should be assured [this is particularly true of NSW where many of our teachers are recruited from];
 - Mutual recognition is particularly necessary in the ACT context because of the large pool of transitory teachers who seek work in the Territory for family reasons and who are cross posted to other jurisdictions where registration regimes are already in place.

As regards representation on the new body, it is important that teachers and teacher employers, educators and unions are represented. Preferably the body would be kept sufficiently small in size to retain effectiveness and efficiency.

Yours sincerely

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