

## Community response form

The purpose of the community consultation process on an ACT Schools Standards Authority is to seek your views on:

- How such an authority might improve ACT school education, across the public and non-government sectors
- What functions the authority should undertake and what operational model should be adopted.

You may download this form from the ACT School Standards Authority project website at [www.det.gov.au](http://www.det.gov.au)

Responses need to be submitted by 1 September 2008.

**Please indicate your personal or professional role and the sector in which you work or have a particular interest. You may tick more than one box.**

	Public schools	Catholic	Independent
Teacher			
Other school-based employee			
Student			
Parent / carer			
Principal			
School Board member			
Parent committee member			
Teacher Educator			
Educational administrator			
Union representative	Yes		
Member of the public			
Other stakeholder (please specify)			

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Consent to your submission being published on project website	Yes

**Question**

The goal of an ACT School Standards Authority would be to improve student learning through establishing and monitoring standards across a range of functions.

How do you think an ACT School Standards Authority might add value to ACT school education?

**Comment**

As indicated in our submission to the original discussion paper in March 2008, the AEU does not believe that any value will be added to ACT school education by including teacher registration within the functions of a Schools Standards Authority. The reasons for this will be expanded upon in the subsequent questions.

The degree to which Models 2 or 3 may add value will be dependent upon a number of factors yet to be determined. These include the level of ongoing government resourcing provided to the new Authority, the ability of the Authority to provide objective, independent, professional advice, regardless of Territory or Federal government policies; the ability to develop and encourage the application of wholistic standards that properly assess student achievement, rather than the limited nature of standardised tests; agreement being reached with the stakeholders on what constitutes effective 'schooling standards'.

However, in principle, the AEU believes that the most potential for added value arises from Model 3 through such improvements as:

- The streamlining of curriculum and assessment processes P-12;
- Increased consistency in curriculum across all years through the development of agreed curriculum frameworks;
- The provision of professional support for school based assessment and curriculum development that currently occurs within the ACT public sector;
- The creation of a central data bank on student performance across all sectors within the ACT, public and private.

**Question**

The consultation paper discusses five possible functions an ACT School Standards Authority could undertake: curriculum and assessment; certification; registration of non-government schools and home education; teacher registration; and schooling standards.

Do you have any comment on one or more of these specific functions?

Are there any additional functions you would like to propose for an ACT School Standards Authority?

**Comment*****Curriculum and Assessment***

Given the movement to nationally consistent curriculum frameworks and assessment processes, it is appropriate that this function be centralized for P-12. However, if the Authority is to be able to perform this function effectively:

- Greater resources than are currently available within the ACT education systems must be provided;

- The ACT's school based curriculum and assessment processes must continue to be supported rather than undermined;
- It must have the ability and the resources to develop curricula and assessment processes that meet the needs of the ACT community rather than merely implement enforced national standards;
- The assessment data collected must not be used for inappropriate comparisons of student performance. To achieve this, legal regulations should be agreed between the stakeholders and enshrined within legislation.

### ***Certification***

Currently primary and high schools within the public system each have their own certification processes. The creation of an Authority with the legislative authority to require comparable certification processes from P-12 would be of benefit to both teachers and their students.

In setting up this authority it would be useful to analyse the role of the ACT Accreditation and Registration Council to ensure there is no duplication of function.

### ***Registration of non-government schools and home education***

The current procedures for registration of non-government schools and home education seem to operate well.

There would appear to be little advantage in taking this role from DET. In particular the issues associated with home schooling have little affinity with the other functions proposed for any of the suggested Authority models.

### ***Teacher Registration***

The AEU strongly argues that the Teacher registration/standards process should be a stand alone function. It does so for the following reasons:

- The promotion of standard based teaching professionalism amongst teachers themselves will not be successful unless government shows its unequivocal support of it. Placing it within a structure such as Model 1, that has two other critical functions, will be read as a lack of commitment to teachers. The interests of the teaching profession will be in constant tension with those of the other two streams, with all 3 fighting for limited resources and time.
- The unanimous decision of the Reference Group on Teacher Registration in the ACT was to establish an independent teacher registration board. It did so recognising that the new board would, at least to begin with, have a limited range of functions. But it was hoped that over time a full range of professional responsibilities would be taken up by the authority. Now this compromise position has been further compromised by suggesting under Model 1, that the minimal professional role be also put in competition with the two other functions.
- The suggestion that a single Authority to undertake all the proposed functions would be cost efficient is illusory. There is no efficiency in creating a body that does not have the full support of the profession for which it must serve. Its life would be short and its work frustratingly

ineffective.

- The suggestion that transferring the function of pre-employment checks to a new Authority in 2011 would somehow constitute the creation of a Teacher Registration process shows a profound lack of understanding of what a teacher registration board should actually do. For teachers to voluntarily seek registration with an authority, professional value from doing so will need to be evident: pre-employment checks do not come anywhere near representing professional value.

### **Schooling Standards**

The concept of 'Schooling Standards' requires more development.

If Model 3 were implemented then the new Authority would have the ability to monitor and report on territory-wide curriculum and assessment data. The AEU would support this minimalist role provided that there was agreement with the stakeholders on the protocol for the use of the data, and such protocols were protected through a legal framework such as legislation.

However there would appear to be little need for the Authority to proceed beyond this minimal role given that:

- the current "Schooling Excellence" review processes in the public system are well supported by the education community and are structured to meet the needs of the ACT system
- the processes for the validation of independent schools, though different to the public sector, are also well supported by those stakeholders and structured to meet their specific needs.

### **Question**

The consultation paper proposes three models for an ACT School Standards Authority.

What are the advantages and disadvantages of the models? Which model do you think is the most appropriate for the ACT?

(Please feel welcome to propose a variation to one of the models or develop another option)

What suggestions do you have for governance and Board membership?

### **Comment**

As a result of listening to the viewpoints raised by stakeholders at the forums, the AEU's preferred model is Model 3. The reasons for this have been detailed above but to summarise:

1. the inclusion of the teacher registration function is strongly opposed as to do so would fail to meet the professional needs of ACT teachers;
2. there is no value added by the inclusion of the functions in Business Support

Unit 2 of Model 2;

3. there are distinct advantages to be gained by the creation of an ACT Curriculum and Assessment Authority as per Model 3.

On the question of governance some key points of principle are:

1. The Board must be able to provide independent, objective, professional advice to government;
2. The Board should report directly to the Minister;
3. The Board should be representative of the stakeholders, with the ability to include additional members to fill specific expertise gaps, if necessary.
4. The Authority should have guaranteed, independent funding, sufficient to perform its functions.
5. The Authority must have its own legislative underpinning and this legislation should be agreed with the stakeholders.
6. If Sub Committees are used, then they should have at least 2 Board members on them and additional members to meet specific stakeholder and expertise needs.
7. The Authority must be a new entity, not merely an extension of the current BSSS.

**Question**

Do you have any further comment on how the Government might move forward to establish an ACT School Standards Authority by 2011?

**Comment**

In recommending Model 3, the AEU does so on the basis that the creation of the Teacher Registration Board should be the priority. If there are insufficient resources to implement both proposals then it is strongly argued that the Teacher Registration Board should be established first.

The AEU reiterates in the strongest terms the requirement for additional resources to provide adequate support for any of these new bodies.