

Initial Submission to BOSTES Review

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Note: This initial submission to the NSW Ministerial Review of BOSTES was made prior to the release of the Issues Paper and accordingly has not specifically addressed the questions outlined in that Paper. It has been slightly revised and formatted since its original submission. It is offered on the basis of the writer being the former Chief Executive of the Institute of Teachers the functions of which are integral to the functions and operations of BOSTES. The writer was a former member of the AITSL Board during the period when the majority of the nationally agreed teaching standards, key registration elements, standards and procedures for the accreditation of initial teacher education (ITE) programs, the framework for teacher performance and development processes, the principal standard and a higher level certification system were developed and to a considerable extent implemented through agreed processes with jurisdictions, and utilising the legislative functions of those jurisdictions. The writer was one of the authors of Great Teaching, Inspired Learning (GTIL) from which is a significant element of the current work and functions of BOSTES. The writer was for a time a member of the Schools Advisory Committee to the Minister (a committee surprisingly omitted from references to educational architecture in NSW).

As a courtesy as it reflects on the work of BOSTES, the submission was forwarded to the President of BOSTES. However, it in no way is authorised or agreed by BOSTES. This point is made by way of transparency as the writer undertakes part-time consultancy projects for BOSTES.

The 1990 Education Act

This Act established the current form of educational regulation in NSW, established the Board of Studies (BOS) in the midst of considerable contestation over its role and the changes being made to some 110 years of mostly steady legislative arrangements for schools and curriculum (regulation of teaching followed in 2004 following the Ramsey review). The Act followed, and implemented, the Carrick Review of NSW Schooling (reported in August 1989) and the Departmental report on NSW curriculum Excellence and Equity. An account of the much contested issues involved in the passage of this Act is given by G Riordan and S Weller in a paper to the 2000 AARE Conference, and in the transcripts of their interviews with key players including Minister T Metherell, then Director- General Fenton Sharpe, Dr Lesley Lynch (from the Ministry of Education and key author of Excellence and Equity) David Patterson, the secretary to the Carrick Review, and John Lambert the first President of the Board of Studies that was created by the Education Reform Act (later renamed Education Act).

As the terms of reference, with supporting narrative, of the current Review of the Board of Studies, Teaching and Educational Standards (BOSTES) embrace the role, functions, governance and organisation of BOSTES, it would be wise for the Review to be informed of the contentious issues

that were thrashed out through the establishment of the then BOS, and be attuned to likely efforts to re-prosecute some of these issues.

By way of summary, this submission draws attention to a number of issues:

- This Act was the most substantial overhaul of education arrangements in NSW since the 1880 Public Instruction Act.
- While primary curriculum was previously addressed in legislation to some extent, the 1990 Act set out a clear prescription of the components of primary and secondary curriculum, for ALL schools, and the second reading speech explicitly defended this on the grounds that NSW democracy required the Parliament to establish such a framework, making it somewhat immune from passing political enthusiasms, but also removed from the exclusive control of the NSW Department of Education (DoE).
- The Minister was given the power to approve syllabuses, with the Board of Studies given the exclusive power to develop and recommend/propose syllabuses. The answer given to the charge that this arrangement politicised curriculum was firstly, that a Board inclusive of key stakeholders from the educational community had the prerogative, not the Minister, to develop the syllabuses, secondly that the Minister was politically accountable to the people and the Parliament, and thirdly the introduction of Section 15 requiring the Minister to make public his decision, and reasons, for refusing a recommendation on the curriculum from the Board, if requested to by the Board, was advanced in the second reading speech as a sufficient safeguard against excessive politicisation of syllabus content.
- The proposal of the Carrick committee for government schools to be regulated equally with non-government schools (school registration processes) was watered down to a requirement for the Director General to vouchsafe that government schools did indeed meet the same key requirements (set out in S.47 of the then Act). NOTE: a modification to this regime was made in the new BOSTES Act of 2013, providing for a more formal oversight of Departmental school standards, but still less than identical processes to the non-government schools.
- Accordingly, the Board's school registration processes (through the registration committee) related only to non-government schools. A further innovation was the provision for 'registration systems' whereby the Board would approve a self-regulation and oversight regime with annual audits of some schools within each system. All Catholic dioceses and groups of Christian schools formed such systems. The registration committee did however include representatives of the government department and teacher union as well as non-government stakeholders.
- An examination of the criteria for school registration reveals the limited nature of some of the provisions. For instance, the requirement for qualified staff in non-government schools was limited to 'staff who had the necessary qualifications OR experience, or who were supervised by persons who held the necessary qualifications OR experience'. The Board did not even attempt to specify the meaning of 'necessary' (arguably the only element to provide a possible benchmark within this impossibly flaccid criterion) until the Government

established the Grimshaw review into non-government schools, and the Ramsey Review of teaching ("Quality Matters' 2000) and indicated the days of such under-regulation were over. The establishment of the NSW Institute of Teachers (NSWIT) in 2004 resolved this issue.

- The Education Reform Act for the first time introduced principles to underpin the Act in S.4 (a novel arrangement generally) and defined the principal purpose of the State in the education of children to be the provision of public education. The State exercises this through the DoE in terms of delivery but more broadly also through the Board in establishing the conditions/standards for quality of provision albeit then and now in an ambiguous fashion through the functions of the Board as applied to the public sector. The actual operations of the Board with regard to the non-government sector, with the fragility of some operations and criteria, could also be seen to be incomplete despite the potential strength of S.4 (c) asserting the duty of the State to ensure that every child receives an education of the highest standard.
- There were other developments regarding the regulation of home schooling, some provision regarding early childhood education and other things.
- The broadly-based representative nature of the membership of the Board was a central strategy of the Government and the legislation in establishing the independence and authority of the Board. As became clear in the reflections of key players of the time as they looked back, while the independence of the Board from the DoE was effectively established, it was not independent of the Minister and a consensus emerged that over the years that overt political control over and direction of the Board in the pursuit of its functions became more marked.
- Further, the device of Section 15 requiring a Board demand of a Minister that the Minister publicise reasons for refusing a recommendation has been seen as inoperable.

For the current review, the decisions to outline the NSW curriculum in legislation, the centrality to the Board's authority and competence of the broadly-based representative membership of the Board, the exclusive authority to develop and propose syllabuses to the Minister, and the inutility of Section 15 seem to be brought into play by the terms of reference. Further, the scope and powers of the Board in the narrative around the formal terms of reference are opened up entirely, including in relation to other agencies. The addition of the reference to functions being possibly transferred to and from the Board, as well as being extinguished, suggest the Review must consider the continued validity of the principles of the Act (S.4), the Principal objects of the Act (S.5), the Objects for administration of the Act or education generally (S.6) and S.15.

The functions of the Board, under this Act, are set out in S.20A. This is discussed below.

Developments in legislation in 2013/2014

The decision of the NSW Government to merge the Institute of Teachers (2004-2013) with the Board of Studies resulted in the Board of Studies, Teaching, and Educational Standards Act in 2013 (BOSTES

functioning from 2014) and the Teacher Accreditation Act 2014 (TA Act) (essentially repository of the functions and operational details of the Institute of Teachers Act).

Some issues are:

- The functions of the Board are now distributed over three Acts (S.20A of the Education Act; S.6 of the BOSTES Act; S.7 of the Teacher Accreditation Act). While this outcome is the result of the legislative timetabling challenges of 2013 and the desire of government to achieve the formal implementation of the new entity in Jan 2014, the outcome of multiple Acts is inelegant and should be remedied.. A prior review of the Institute of Teachers Act by its officers, with consultation and approval by the Minister, led to amendments to address problems in the original Act including issues identified by the Crown Solicitor in response to request for advice. These proposed amendments were held over and incorporated into the 2014 TA Act.
- The new legislation did include net additions to the functions of BOSTES over the sum of the pre-existing functions of the prior bodies. In particular, the BOSTES Act S.6 (1) provision that

The principal objective of the Board is to ensure that the school curriculum, forms of assessment and teaching and regulatory standards under the education and teaching legislation are developed, applied and monitored in a way that improves student learning while maintaining flexibility across the entire school education and teaching sector.

It is available to the review to consider the extent to which this omnibus power and role might be more systematically and robustly addressed by BOSTES, in the context of the Minister's desire for the schooling system to be able to meet the highest international standards of achievement.

- The TA Act also implemented GTIL recommendations, in particular the incorporation of all 'existing' teachers (that is, the not yet accredited pre-2004 teachers) in schools from 2018, and early childhood teachers from mid-2016. Further strengthened functions are found in the TA Act in S.7, in particular to ensure the teaching standards are applied fairly and consistently, to monitor, evaluate and report on the quality of initial teacher education and professional development courses. The recommended actions from GTIL were supported by these additions, with five reports on aspects of ITE programs now completed.

Suggestions for matters to be addressed in this review, in light of the rationale, background and procedural commentary in the terms of reference

Teacher regulation functions

In 2004, an unusual feature for professional regulatory bodies was introduced, namely the creation of Teacher Accreditation Authorities (TAA) for each level of accreditation. Strictly then, NSWIT was not the accreditor of teachers, could not suspend or revoke teachers, and effectively established a

framework with a power to issue guidelines with little enforcement power. The BOSTES Act and TA Act reforms in 2013/14 removed TAAs from teacher accreditation at the initial preliminary accreditation levels of provisional/conditional – this eliminated the foolish arrangement whereby a myriad of school authorities were making decisions on qualifications for entry into the profession, a procedure unknown interstate or in other professions. BOSTES is now the authority for this function. It remains for it to mature now into being the true professional regulator instead of overseeing an operation akin to a 7/11 store franchise system. Currently BOSTES exercises some regulatory-like functions for proficient teachers (extends time periods, grants leave etc) in ways which could clash with TAA decisions regarding the same matters (eg a TAA declining to support an extension of time for compliance). The decision to grant Proficient Accreditation should still be based on the information from the school/principal but not under the guise of a TAA but as the professional supervisor, thus eliminating clashes and tension between responsibilities arising under the TA Act and the Teaching Services Act which controls employment in the public sector or under industrial regulation in the non-government sector..

As below, BOSTES to replace school TAAs for Proficient teacher accreditation, to be re-named teacher registration at provisional, conditional, proficient, being the mandatory professional requirements. TAAs for proficient accreditation abolished.

As below, introduce a criterion of 'fit and proper person'/'good character' so BOSTES emulates all other professional regulatory bodies instead of retaining a pointlessly exotic arrangement.

Introduce a panel/tribunal to deal with revocation or other conditional requirements for practice. The current policy development re revocation will have this for reapplications of revoked persons, so this can be easily extended to first instance suspension/revocation. This would reflect mature practice elsewhere, including comparable overseas' jurisdictions (Ontario, British Columbia, Scotland) and other professions. The Review panel is encouraged to be advised of the current policy developments within BOSTES in this regard.

While the recent legislative changes have introduced the power for BOSTES to suspend and revoke the accreditation of a teacher for reasons set out in S.24 and S.24A (relevant criminal acts and serious misconduct), the current legislative provisions do not clarify obligations on employers/TAAs to notify BOSTES of relevant cases and information, and retain the duplicating power of TAAs to revoke accreditation, with obvious potential for confusion of authority. This should be remedied with exclusive powers residing in BOSTES. As well, the regime for applying conditions to accreditation/registration and practice such as requirement to undertake relevant courses either prior to returning or simultaneously with return to teaching, such in classroom management, professional boundaries with children or colleagues, subject content, should be developed to ensure transparency.

Initial Teacher Education functions

The legislative provisions improved to cover some matters needed for the full implementation of the new national Standards and Procedures, and to pick up helpful provisions in other jurisdictions.

BOSTES powers are clear to fully oversight ITE programs, subject to the TEQSA Act (Cth) and in conformity with the exception afforded under S.9 (2) (b) preserving the right of a State to determine the requirements for carrying on an occupation. GTIL has initiated credible reviews of aspects of ITE programs in cooperation with universities. AITSL, working with teacher regulatory authorities and the ACDE, has introduced in 2016 new program accreditation processes focused on robust evidence of quality of implementation and outcomes. The Review should ensure that BOSTES powers are ample to further these initiatives. In particular, the proposal below for the Centre of Statistics in Education (CESE) to be aligned with BOSTES rather than the DoE would bring a very powerful capacity for the examination of quality in ITE provisions. Interstate legislative provisions that may be not adequately represented in BOSTES legislation should be considered (for instance, a fuller and explicit procedure for giving conditional approvals, and for appeal processes).

School Registration Functions

This submission will only comment on this in three regards:

- i. there should be a clearing up of the flimsiness of the BOSTES powers and responsibilities re government schools
- ii. while broadly similar arrangements should apply across schools in the different sectors the primacy of the public school system to ensure there is an available education, and school place, for every child, must be acknowledged and respected in these processes, and
- iii. the welcome development of a Teacher Accreditation manual by the merged BOSTES, using a rule making power not available to the former Institute, would not be lost upon adoption of the proposal to abolish TAAs for Proficient teacher accreditation – rather, the oversight provisions, and strict requirements and accountability provisions could be amended to apply equally to the same persons and entities under the guise of school regulation/registration and conformity with the requirements of the professional teaching standards. This should include the obligation of school authorities to notify BOSTES of relevant S.24 and S.24A cases in a timely manner.

Quality audits, reports and data

A key affliction in the generation of and access to comprehensive data about teaching, schools and student results lies in the division between Commonwealth and State collections of data (with different rules for access), and between the three sectors and the collections they hold, or could/should hold, and the relationship of these to the actual and potential collections of BOSTES. This should be addressed in the review.

Currently both BOSTES and CESE undertake reviews in different ways. There is some coordination between these two, but this could become a much more powerful tool for educational progress in NSW.

New strengthened BOSTES school registration and review functions will require the generation of data, and its appropriate publication.

BOSTES has in place capacities for cross sectoral operations, and should be given greater powers to require data from schools as a condition of registration. CESE has significant capacity to develop, access and report on data from government schools, but is limited in respect of one third of all schools. Further, the location of CESE within the DoE potentially compromises the strength of its possible findings or capacity to publically report adverse, critical findings.

The combined capacity of CESE and BOSTES could produce authoritative studies and reports into benchmarked approaches to teaching, teacher education and schooling practices generally, in key areas, oversight quality in the provision of professional development courses approved by BOSTES (an area needing attention)etc.

Ideally CESE should be transferred to BOSTES. Alternatively it could be established with a looser connection to BOSTES, with a status something like the Bureau of Crime Statistics which is independent in the control of its work although it is not formally a separate government department. However given that BOSTES is not an equivalent service provider (say, to the police Department in the example given) the case for separation from the department is strong but not relevant for BOSTES.

Funding of non-Government schools

Section 4 c and d of the Education Act provide, somewhat awkwardly, as follows:

(c) it is the duty of the State to ensure that every child receives an education of the highest quality,

(d) the principal responsibility of the State in the education of children is the provision of public education.

The charter of the Board obviously arises principally under 4(c). It is unclear why the DoE should have any role in the distribution of state funds to non-government schools, its role arising principally under 4 (d). This extends to any auditing of schools for mismanagement of funds etc. These functions should be transferred to BOSTES as it is inappropriate for a department which is essentially a competitor or alternative to other sectors of schooling to have such a regulatory function over them. Oversight of use/application of funds fits best with BOSTES oversight functions.

BOSTES relations with other organisations

Department of Education

Current relationship between BOSTES and DoE (in the TAA at Proficient Teacher accreditation process particularly) resembles the structure of 7/11 store franchise arrangements. So, the TA Act creates a power and obligation on the DoE Secretary to appoint TAAs for Proficient and higher level accreditation (it once also required it for provisional accreditation but this was addressed in the 2014 amendments.). The TAAs appointed hold their primary obligations under the Teaching Services Act if they are principals, and under the Public Service Act if Directors/Executive Directors. They are

subject to their line management for direction. But the TA Act creates new obligations on them outside of this line management. If they do not perform their TAA duties, well or at all, then there is no effective remedy from BOSTES, and none if the Secretary is not engaged (the new TAA Manual is intended to ameliorate this situation). Further, suspension and revocation can be performed by both TAAs and BOSTES, with no clarification as to how these powers should intersect. Principals cannot dismiss a teacher, and revocation is a higher penalty which they cannot enact either. If a different TAA is appointed for Proficiency but only in regard to suspension/revocation then there is a proliferation of TAA roles, even at one accreditation level. Occam's razor should apply.

No interstate teaching Act sub-lets its central functions, nor do regulatory bodies in other professions.

Essential to the notion of a profession are structures and processes, with standards, for defining the boundaries of the profession and articulating and supporting and enforcing acceptable practice. While employment practices and obligations bear on the same individuals simultaneously, employers should deal with employment and the professional body deal with membership of the profession. Advice and reports from the employers are of course highly relevant in such processes.

Accordingly, there is a clear conflict of interest in having the DoE responsible for the functions of the BOSTES – the strict requirement for the payment of fees (legally a condition of accreditation and right to practice) is an obvious illustration of confused processes.

As the review is interested in non-duplication of function, and simplification of arrangements generally, and in practices which might enhance professionalism then this review should recommend the abolition of the TAA concept for Proficient Teacher accreditation (that is, its complete removal for the mandatory, profession defining processes) and the BOSTES be invested with this role exclusively.

It follows that a further set of legislative steps should be taken to support this function. These include: introduction of a condition of accreditation of 'fit and proper person' or 'good character' (terms used in all other teacher regulatory legislation and commonly in other professions as well), a machinery to assess this (the Working With Children Check (WWCC) is not it; this is a more limited checking for serious crimes against children and does not cover all that might be considered), a panel/small tribunal etc to hear revocation issues etc.

It would be opportune for provisional and conditional accreditation, and proficient accreditation, to be re-termed as 'registration', with 'certification' being reserved for the higher levels. School based TAAs could remain for HAT/Lead, these not being requirements of the licence to practice

'School Registration'

The review documentation refers wrongly to BOSTES registering all schools, giving them the licence to practice. It is worth building on the recent changes to introduce a cleaner, stronger school regulatory function and practices. It should be of two steps, firstly the basic compliance with requirements to operate and secondly a capacity for BOSTES to investigate the quality of provision, generally in a school and with regard to specific issues. The basic registration might require some

more inspectors, and a higher auditing threshold for systems, but a revised and strengthened system approach could be retained. The DoE schools 'registration' probably should not be called registration as there will be little capacity to remove it given the universal obligation role of government schools, and the DoE is required to meet the minimum requirements in any case.

The higher level reviews should treat all schools equally and be able to target multiple measures/practices including pedagogical practices especially relating to performances in NAPLAN etc, student welfare, not sure about governance – maybe an employer/managerial function except where evident dysfunction warrants intervention from external agency as student education imperilled.

Schools Advisory Council

Note the Schools Advisory Council's (SAC) mysterious absence from the review.

Note that it was born of a push to re-institute something like the old Ministry of Education from the early Greiner years but without the formality and authority of that structure as the two non-government sectors wanted some direct policy leverage at high level but without formal subjection to a structure, and the DoE, which doesn't need a new mechanism for such leverage generally opposed to a Ministry type structure. With the demise of the NSWIT the sense of the school sectors combining to define common interests within the operations of the semi-secretive SAC becomes a pronounced possibility.

The key principle should be that no alternative body should exercise advisory functions which tend to undermine or sideline formal advisory responsibilities created under statute. This exists now specifically in relation to the syllabuses to implement the NSW curriculum and the determination of the content of the professional teaching standards, both exclusive to the BOSTES.

While the Minister can be advised as he wishes, and might meet with any grouping of sectors/stakeholders as he wishes, at the very least the relationship of this SAC to the operations of the Board needs clarifying and codifying. This is especially urgent given the recent episode of the SAC effectively vetoing proposals for the review of the HSC prior to such proposals being considered by the full Board including as it does all of the relevant stakeholders. The express provisions of the Education Act are thereby undermined, startlingly so given the very public debate around these provisions in 1990 and the explicit advocacy of the role of the Board in these matters found in the Second Reading Speech. The omission of mention of the SAC from the terms of reference to the Review, amidst much talk of 'architecture' and explicit referencing of distant Commonwealth entities such as AITSL, ACARA and ESA is disquieting and should not deter the Review panel from addressing this issue. Its abolition should be considered for recommendation as it tends to undermine/short-circuit or duplicate other processes.

Australian Institute of Teaching and School Leadership

Previous attempts to establish a national body for the teaching profession failed (recommendations from the 1991-1994 National Project on the Quality of Teaching and Learning – NPQTL – were supported by the Commonwealth and teaching unions and somewhat, tepidly, by national non-

government school authorities, and by the Deans of Education. However, the NSW Minister and Department led opposition to the recommendations and rounded up interstate government opposition/non-cooperation to the Australian Teaching Council which was wound up in 1996/7. Other efforts through the convenorship of the Australian College of Educators produced some good statements about the profession and the need for standards, but little else. With the 2009/10 National Partnership on Teacher Quality, NSW supported the Rudd/Gillard Government's proposal to establish the Australian Institute of Teaching and School Leadership (AITSL), and NSWIT contributed a paper to this effect to the Commonwealth consultancy on the matter. The NSW Government supported the establishment and even tendered to host it in Sydney.

The first AITSL Board had representatives of all jurisdictions and the head of NSWIT represented the NSW Minister/Department/jurisdiction – the only jurisdiction to nominate the head of its teacher regulatory body to the Board, the others nominating DGs or other senior officials.

NSW cooperated with, and in some instances, led AITSL work to:

- develop national teaching standards (articulated at 4 levels to replicate the NSW model)
- develop 7 points of national consistency in registration requirements
- implement a national framework for ITE accreditation which is delivered by and through jurisdictions but has a number of roles for AITSL as well
- develop a national version of the higher level accreditation, named certification and currently operating in NSW, NT, ACT, SA, on hold in WA and to be explored this year in QLD, and
- develop other policy/practice frameworks in teacher performance development, professional development, and a Standard for Principals.

This work was effectively finished by 2013.

A reshaped AITSL Board to reflect the 'contemporary governance practices and standards' led to a much reduced Board, ejection of teacher unions and teachers generally, and theretention of sector and organisation representatives under the rubric of being 'experts'. AITSL accomplished much good work early precisely because of its very inclusive Board that offended Department of Finance ideals of governance

While AITSL does seek operationally to include stakeholders, as it must, it will struggle for acceptance of its leadership role under current arrangements, a poor Commonwealth decision.

AITSL is a Commonwealth company, funded by the Commonwealth but with periodic attempts to secure contributing funds from jurisdictions, unsuccessfully; it is a body the Commission of Audit recommended for abolition as an unnecessary Commonwealth agency, and is a body that has in the last two years only really delivered one initiative, namely the revision of the ITE program accreditation process, largely through the cooperation of teacher regulatory bodies and Deans. It has no statutory functions, does not register teachers and has no machinery to do so. It does not accredit ITE programs, and does not approve any PD programs for teachers. There has been no push

from any jurisdiction for there to be national teacher registration and the TEMAG recommendation for there to be implemented a new strong single ITE regulator was rejected by the Commonwealth and AITSL is not such a body.

It follows there is no duplication of functions with BOSTES as AITSL has no functions, other than in the development (in consultation with each jurisdiction) of the ITE accreditation framework and some minor role in the accreditation process (eg it nominates an interstate person to panels, by agreement, a worthwhile role but not a duplication).

Universities will make submissions to the review to the effect that BOSTES role in ITE should either be transferred to AITSL, or that BOSTES be limited to applying both the requirements and processes of the national Standards and Procedures without modification or addition. This would be tantamount to the NSW Minister transferring exclusive power to decide on the preparation of teachers for NSW schools to a Commonwealth company that might or might not continue to be adequately funded, where NSW is not guaranteed any representation, and that will implement lesser standards now applying in NSW for entry, professional experience and subject content. Further it implies the Commonwealth would be happy to fund this function/operation on behalf of NSW. The loss of expertise this would entail in NSW would be difficult to recreate quickly if the Commonwealth retreats from supporting this body, or if interstate preferences for lower standards and requirements dominate its operations to the extent NSW might wish to regain control over who teaches in its schools.

The recommendation to the review should be for BOSTES to work appropriately in tandem with AITSL on agreed agendas, subject to BOSTES being afforded more direct membership on the AITSL Board or much improved and transparent involvement of BOSTES by any DoE representative than has been evident in recent years.

BOSTES, ACARA and Curriculum

The lessons of the 1990 legislative developments should be carefully pondered.

The key aspects of NSW curriculum are legislated, but with considerable freedom for syllabus design to implement it. Cooperation with a national agency has proven possible and it not clear there is any problem to solve.

Governance of BOSTES

With the merger of the two bodies, BOSTES inherited two large senior committees. These could be streamlined to a Board of some 12/13 stakeholder nominees with requisite expertise. The QTC should be established with clear authority under the Board to be the key advisory body for the teaching profession in respect of the professional teaching standards. It could be reconstituted with 10 to 12 persons, predominately teachers including elected and appointed teachers and teacher educators. The full possibilities of the content of the professional teaching standards (see below) should be supported by this Review and the QTC invigorated to pursue them fully.

S.20 of the TA Act sets out the matters to be dealt with by the standards:

20 Matters to be dealt with by professional teaching standards

The professional teaching standards may deal with, and make provision for or with respect to, the following matters:

- (a) the skills, qualifications, experience and knowledge required for teaching at each level of accreditation,
- (b) the conditions and criteria for continuing accreditation, including requirements in relation to professional development,
- (c) the procedures and guidelines to be followed by teacher accreditation authorities in relation to the accreditation of persons under this Part (including the revocation or suspension of accreditation),
- (d) the approval by the Minister of initial and continuing teacher education courses or programs that are relevant to the accreditation of persons under this Part,
- (e) the approval by the Minister of those persons or bodies who may provide professional development,
- (f) ethical conduct of teachers,
- (g) any other matter relating to teaching standards.

This is the most extensive brief for the professional regulation of teaching under current Australian legislation when taken together with the other powers and functions of BOSTES (rule making powers, powers to oversight schools including with regards to compliance with teacher accreditation requirements and processes, powers of research and reporting etc). This submission urges the Review to support the fuller emergence of a strong professionalising agenda for NSW teachers, including through their substantial presence on the QTC and the Board. This is not an argument for a concept of untrammelled self-regulation (substantially eroded by government legislation in other professions in the wider public interest) but does support the notion of teacher participation and leadership in the structures and processes which define and oversight the profession.

Finally, a forward looking agenda might empower the Board to be able to offer researched and modelled advice on the operations of schools and the structured support for teaching and learning that might learn from leading practices elsewhere, including those that might require very substantial reorganisation and resourcing to implement where the evidence for doing so is strong. It is somewhat frustrating for international reviews/studies to observe favourably that schooling systems that reduce substantially the direct teaching time of teachers, but replace it with strong processes of shared lesson development, examination of practice, application of professional learning, development of teachers in the areas of diagnosed need etc , are wistfully noted, then ignored as there is no mechanism of sufficient power and authority to design suitable Australian adaptations of such approaches.

If the Review wishes to set out a strong agenda for the BOSTES within the total educational arrangements in NSW, then developing recommendations that might situate it to be able to contribute in this fashion would be welcome.

