



Education

**Submission by the NSW Department of Education to the
Review of the NSW Board of Studies, Teaching and
Educational Standards (BOSTES)**

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Introduction

New South Wales has a world-class education system, supporting our students to develop the knowledge and skills necessary for a productive and rewarding life in an increasingly global economic community. Over the past decades, drawing on our strengths, New South Wales has led the national establishment of a modern educational architecture. To take two prominent examples, the NSW Basic Skills Test has matured into NAPLAN and the NSW Professional Teaching Standards have grown into the Australian Professional Standards for Teachers.

This step change in Australian education has been achieved through a partnership approach in New South Wales, with the NSW Board of Studies, Teaching and Educational Standards (BOSTES) (as, previously, the Board of Studies and Institute of Teachers), government and non-government education providers all playing critical parts. It is now an opportune time to consider how best to ensure that the education sector in New South Wales continues to advance quality education, to the benefit of students and the community at large.

The demands placed on education by the knowledge economy are well understood, though they will continue to evolve, demanding an ongoing institutional and sectoral agility. Fundamentally, to drive ongoing increases in productivity, countries require high levels of human capital. An increasingly large proportion of our citizens – and our students – require high levels of cognitive and meta-cognitive ability and the capability to bring these to bear in content domains of high need.

New South Wales has long prided itself on the calibre of its end-of-school credential and the extent to which it supports these aims. The NSW Higher School Certificate embodies the high expectations agenda that has underpinned NSW educational policy for the last decade, affording students a full range of courses for study, including high quality vocationally oriented programs as well as the high-level Mathematics and Science subjects that support the development of a 21st century workforce. The credential is reinforced by strong curriculum and assessment across the school years, high quality teaching, and a strengthening alignment with early childhood education and care.

The challenge now is to ensure that the educational architecture in this state strikes the right balance between rigour and agility so that New South Wales retains a position of educational leadership and educational provision remains high quality and relevant in rapidly changing times. To this effect, the recurring themes in this submission are:

- A strengthened strategic focus for BOSTES, governed by a forward-looking and agile Board, and drawing clear distinctions between the responsibilities for leadership and implementation
- A strengthened focus on the quality assurance of accreditation processes, underwriting appropriate delegation of roles and responsibilities to systems
- A risk management approach to balancing the need for rigour with agility in a rapidly changing landscape
- A focus on process improvement to ensure clarity of purpose and to facilitate nimble analysis, quality support and policy development.

1 Have the opportunities of the amalgamation been fully realised?

The creation of BOSTES was a strategic bringing together of the curriculum, assessment, teaching, and school regulation arms of the state architecture. This new structure recognises the inherently interconnected nature of these fields of activity in the optimisation of student outcomes, which is the overarching objective of government in education.

The establishment of the current structure is a powerful first step to achieving the strategic integration of key educational levers. For the benefit to be realised, however, BOSTES needs to become more than the sum of its parts, which currently continue to operate as several separate entities. BOSTES's peak decision-making forum (the Board) should clear space for strategic assessment of the interplay between, and cohesiveness of settings across, the relevant policy areas. For example, the Board is well placed to consider where to strike the right balance between the dual commitments currently held to high levels of teacher professionalism on the one hand, and curriculum specificity as manifest in the BOSTES syllabuses on the other.

The BOSTES syllabuses are currently the mechanism through which the Australian curriculum is implemented in New South Wales. This model explicitly retains jurisdictional flexibility to address local contexts and needs. However, the syllabuses in their current form are highly specified, on the assumption that quality is best assured through standardised and consistent delivery. As Andreas Schleicher has observed, this approach and its underpinning assumptions are inconsistent with a high trust professional model of teaching and countries like Australia will struggle to keep the best teachers in the profession whilst ever 'they are just there to implement prefabricated knowledge'.

This need not be the case. Australia and New South Wales have the supports necessary to buttress a high trust model – standards, transparency of data, accountability. Teachers – accredited against the Australian Professional Standards for Teaching – should be equipped to exercise independent and flexible judgement. This assumption of professionalism is embodied, for example, in the Australian Government's annual Nationally Consistent Collection of Data on students, which has at its core the professional judgement of teachers who are now required to report on their students whose learning is impacted by disability.

To free up the space to address a more strategic agenda, it may be necessary to improve and streamline processes and practices and to relegate operational and procedural issues to the level necessary for their effective resolution (more detail under subsequent questions).

2 Are roles and responsibilities clear and appropriate?

The BOSTES should be one of the key bodies through which New South Wales can establish, implement and maintain the standards necessary to support high quality education in this state, and seek to influence and lead the ongoing evolution of a national education architecture. As the Issues Paper observes, the successful execution of this role involves an efficient demarcation of effort both from national bodies and from education providers and other stakeholders within New South Wales.

BOSTES has an interest in, and responsibility for, standards from the perspectives of teacher quality (initial teacher education and levels of proficiency), curriculum (including alignment with the

national curriculum), and school registration. Broadly speaking, standards exist to ensure safety, reliability, interoperability, accountability and, importantly, to encourage innovation. They can be seen to be concerned primarily with regulating inputs to ensure the conditions for the activity that produces quality outcomes. They should not be understood or function as another form of red tape. This can be a helpful lens for distinguishing the optimal scope of BOSTES's role and responsibility.

Teacher quality

The leading work on teacher standards undertaken in New South Wales has borne fruit in the Australian Professional Standards for Teachers. Now that the national architecture has caught up, it is important to reaffirm the future-focused and strategic effort of BOSTES, as distinct from the operational work of systems and schools.

Within New South Wales, BOSTES has a clear responsibility to quality assure teacher accreditation from the Graduate Standard through to Proficient, Highly Accomplished and Lead levels. BOSTES's role as quality assurer of teacher accreditation builds and depends upon its responsibility to quality assure initial teacher education programs. There are some examples that suggest some processes and practices in the accreditation of both teachers and initial teacher education programs could be strengthened. These are addressed under question 3. There may also be scope to clarify for teachers the distinction between BOSTES's overarching responsibility in this area and the responsibility delegated to systems to discharge the duty of TAA. There may also be scope for BOSTES to assume a higher profile role in promoting the profession, for example, through the provision of cross-sectoral networking opportunities for teachers accredited at higher levels.

Professional learning is a mechanism for supporting ongoing quality and quality improvement within the existing teacher workforce. As such, it is an area where responsibilities have become most blurred and could benefit from clarification. BOSTES has a clear role to support capability building in relation to curriculum change and standards, and to work with jurisdictions in ensuring staff have access to information and training as appropriate. The valuable opportunity to benchmark educational standards associated with marking the HSC or the writing domain of NAPLAN should be an ongoing focus of activity in this area.

Apart from curriculum related capability building, the primary responsibility of BOSTES with regards to the provision of professional learning is to the clear description of standards for quality professional development and the administration of a transparent, efficient and effective process to identify courses that meet these criteria. Some areas for strengthening and streamlining processes and practices are outlined under question 3. A more important point here is the potential conflict of interest that arises, should BOSTES seek to become both the standard setting body for teacher professional development and a major provider of courses to meet that standard.

Responsibilities regarding the production of teaching and learning resources are similarly blurred and wanting clarification. While BOSTES has a clear responsibility to provide resources to support curriculum implementation, over recent years BOSTES has developed a more comprehensive catalogue of commercial resources that can be used in the classroom. This could be considered a duplicative investment of resources, now that Educational Services Australia, through Scootle, provides a comprehensive curation service for building sets of resources aligned with the Australian curriculum (including high quality resources developed by the NSW Department of Education and

surfaced originally through the online Teaching and Learning Exchange or TaLE). While the proliferation of digitally available content is not a guarantee of quality, the uptake of Scootle suggests that it provides a more efficient and nimble way of promoting relevant and high quality resources than end-to-end development.

Curriculum

Unlike teacher accreditation, where it is necessary that jurisdictions take an active role in implementation, the degree of scaffolding applied to the Australian curriculum is at jurisdictional discretion. The implications of the settings applied here for other reforms such as teacher professionalism have been outlined under question 1, above. Some suggestions for process streamlining are discussed below, under question 3.

School registration

It is important to distinguish BOSTES's responsibility with regards to the registration of schools from the responsibility for ongoing school and systemic improvement, which must sit with the education providers themselves. Under the *Education Act 1990*, the registration of a school represents an endorsement of its proven capacity to provide a safe and supportive environment, qualified teachers and access to the specified minimum curriculum for students.

There is further comment specifically regarding the processes for the registration and accreditation of non-government schools under question 3. Here, the important point is that it should remain the responsibility of individual schools and systems to develop, implement and monitor the policies and procedures that promote ongoing improvement in the delivery of educational services, with the aim of effecting an improvement in student outcomes.

3 Are processes and practices as effective and efficient as possible?

New South Wales has pioneered a number of processes to implement a standards based approach to ensuring educational quality. Two years after the establishment of BOSTES, there are some opportunities to improve and streamline processes, to support the dual aims of quality and agility.

Curriculum

BOSTES is currently responsible for implementing the national curriculum in New South Wales, which it achieves through the development of syllabuses. BOSTES's work in this area has some notable achievements. For example, the BOSTES syllabuses ensure that New South Wales meets the Disability Standards for Education, which require a curriculum design that enables students with disability to participate in learning experiences on the same basis as students without disability.

Through the syllabus development process, BOSTES takes the opportunity to augment the specificity regarding curriculum outcomes and content as well as to ensure that the curriculum reflects NSW priorities and needs and is an appropriate foundation, in the senior years, for the Higher School Certificate. BOSTES is committed to a highly consultative syllabus development process and a full-service implementation model. In addition to the specificity of the syllabuses themselves, this

includes substantial support materials and a year of 'familiarisation and planning' between the syllabus's completion and its introduction in the classroom.

While the commitment to producing a quality product is appreciated by teachers, the now doubled layer of Australian curriculum and BOSTES syllabuses has raised some issues that require working through. Stakeholders such as universities are unclear about the differences between the national and state level curriculum frameworks, with implications for effective training of new teachers. For existing teachers and schools, there is a lack of clarity regarding the obligations and expectations that schools explicitly reference either the Australian curriculum or the BOSTES syllabuses in curriculum planning and delivery at the school level. The commencement of BOSTES registration processes in government schools has highlighted a number of syllabus-related questions, including:

- to what extent are the additional elements of the NSW syllabuses for K-10 providing optional support or mandating additional content?
- to what extent are or should the syllabuses be suitable for use as a teaching program?

Any advantages of additional specificity for some schools and teachers are dependent upon a clear and consistent relationship between syllabus and Australian curriculum. In some instances the BOSTES syllabuses display inconsistency in design and terminology across subject areas, which can create confusion rather than enhance support.

In relation to VET curriculum, the development of the BOSTES Industry Curriculum Frameworks based on the National Training Packages is designed to provide NSW students with the option of counting these courses for the purposes of ATAR eligibility. This is an important consideration aligned with a high expectations platform; however the current process can disrupt the training package qualification packaging rules and contradict the Standards for Registered Training Organisations 2015.

The length of the syllabus development process can compromise agility of response to a changing educational landscape. This is most intuitively understood in the field of technology where a period of two to three years can see whole platforms become either standard practice or redundant. More broadly, the self-imposed requirement that New South Wales, through BOSTES, devote substantial time and resources to translating the Australian Curriculum risks compromising our capacity to provide national leadership – resources are devoted to explicating the current iteration of the curriculum rather than strategically advancing the next. It is possible that a new balance between teacher support and jurisdictional agility could be achieved by identifying a more nimble timeline for syllabus development and working to identify, with appropriate consultation, the most valuable products to be developed within that envelope.

Teacher accreditation

As the Issues Paper notes, the increase of teachers in scope for accreditation will place demands on processes and procedures and argues for ensuring that BOSTES's role as quality assurer is exercised in a way that is both effective and sustainable. Key to this are:

- appropriate delegation of the role of Teacher Accreditation Authority
- QA mechanisms to ensure that the Teacher Accreditation Authorities are exercising their delegated responsibility appropriately
- efficient administrative processes.

The Graduate Standard is the foundation for teacher accreditation and thereby for teacher quality in New South Wales and Australia. Prospective teachers meet Graduate Standard by having successfully completed an initial teacher education program that has been accredited by BOSTES as meeting the national requirements. Many principals, however, have queried the suitability of initial teacher education graduates for teaching, based on their experience during the practicum component of their degree. There may be an opportunity to strengthen the application of the Graduate Standard through a review of the evidence required to demonstrate an ITE program's consistent and objective assessment of the practicum as a key component of its course.

Increasing demands on the accreditation process point to the necessity of affirming the efficiency of all associated processes. The Department of Education and BOSTES are working in partnership to ensure the timely redevelopment of the complementary systems for recording professional learning (MyPL@Edu and eTams) prior to all teachers commencing maintenance of accreditation. Changes will enhance user experience and data transfer.

The processes for teacher accreditation should be reviewed to ensure the most efficient system is operating to ensure high teaching standards in NSW schools. It may be useful to benchmark the processes for preparing for, assessing and maintaining accreditation that have been implemented in other jurisdictions, to ensure proper rigour and quality assurance without undue administrative burden for teachers or systems. This may be particularly helpful where the higher levels of accreditation are concerned, given the procedural complexity of accreditation at Highly Accomplished and Lead. While there is no doubt that BOSTES has a primary role to play in promoting consistency of judgement across TAAs, particularly with respect to the higher levels of accreditation, there is scope to consider whether current processes are best designed to achieve this. For example, could the function of the Moderating and Consistency Committee (currently to promote consistency of judgement through the provision of non-binding review comments on applications for accreditation at higher levels) be more effectively and efficiently achieved through the provision of direct training in consistency of judgement across sectors?

Accreditation of professional learning

The identification of quality professional learning to support teacher accreditation is a clear responsibility of BOSTES. Process improvements are indicated to ensure that this occurs effectively and efficiently. The described processes for seeking endorsement as a provider of professional learning by BOSTES, through the Quality Teaching Council, place significant emphasis on the alignment of the programs with the descriptors from the Australian Professional Standards for Teachers. There is much less transparency, however, about programs' and providers' ability to address the needs of teachers with regards to specific curricula and outcomes. In addition, the process whereby the application is assessed involves three decision-making bodies: The Professional Learning Endorsement and Advisory Council, the Quality Teaching Council and the BOSTES Board. This is one example where operational decision-making could be streamlined to ensure that

authority resides at the appropriate level and does not compromise the Board's time for more strategic deliberations.

School registration

As the Report on the Registration Process for the NSW Government Schooling recognises, school registration of government schools is an example of delegation of responsibility to the system, such that 'the Department is responsible for the compliance of the government schooling system and for ensuring that its schools meet the requirements'. As the Report also acknowledges, 2015 was the first year of operation for this process. The Department welcomes the commitment by BOSTES, articulated in the report, to explore further in 2016, the ways in which the Department's systems can assume a greater burden of responsibility for demonstrating compliance, maintaining the rigour of the QA process, while reducing the impost on schools.

The Department would like consideration to be given to the better alignment of NSW and Commonwealth governance standards to improve risk management and monitoring standards for non-government school registration. There are two specific proposals which would facilitate consistent action against non-compliant non-government schools by New South Wales and the Commonwealth:

- BOSTES introduces a 'fit and proper person' requirement for the 'responsible persons' of registered schools, in addition to the current assessment of 'good character'. This requirement would align with the Commonwealth Department of Education and Training funding compliance requirements for non-government schools which considers, among other things:
 - the experience and expertise of the person and key individuals administering a school and providing education at a school
 - governance arrangements, and
 - records of financial management.
- BOSTES incorporates the consideration of a non-government school's ongoing financial viability as part of the criteria for initial registration. Including financial viability as a basic requirement would:
 - reduce the risk of a school beginning operation without the capacity to demonstrate financial sustainability, and
 - align New South Wales with Queensland, Western Australia and the ACT regulations.

Data management

Timely access to accurate data is at the heart of evidence based policy, practice and decision making, at all levels from the individual classroom teacher to system and jurisdiction. The NSW Government has established a clear priority for open and transparent access to and use of data through the Open Data Policy and the NSW Government Information Framework, the latter of which is designed to help agencies share data while observing data management protocols to appropriately protect

personal information. There is scope for BOSTES to enhance the availability of data to reflect this Government priority.

Effective and timely analysis of educational data in New South Wales could be better supported through process enhancements that enable the Department and other sectors to more readily access participation and performance data for their Years 10, 11 and 12 students from BOSTES and to link this data with their own student records. Similarly, legacy systems have complicated the data management processes associated with BOSTES's role as the NAPLAN Test Administration Authority, where non-government schools are concerned. There is scope to come to common understandings regarding data ownership, governance and management and to streamline these processes ahead of the introduction of NAPLAN online, which will reduce the burden associated with the role of TAA.

With the increasing interest in measuring and improving teacher quality in New South Wales and nationally, there is a corresponding need for detailed, accurate and consistent data relating to all stages of the teacher life-cycle. As the regulatory body responsible for implementing and overseeing teacher accreditation processes in New South Wales, BOSTES is well placed to collect and make available a range of data from all sectors for research and policy development purposes. As a first step, understanding of the teacher data set could be enhanced through the provision of readily accessible, detailed information about what data is available and how it can be obtained.

4 Are effective governance arrangements in place?

BOSTES is a peak agency contributing to the capacity for New South Wales to exhibit educational leadership nationally. As such, it requires a governance structure that reflects the significant consultation necessary to develop high level, effective strategy and implement sustainable change across a diverse sector. Consultation has been an acknowledged strength of BOSTES's operation. At the same time, however, the intensification and acceleration of change in the twenty-first century demands an ability to see beyond the immediate horizon and to conceive and execute an agile response to current and emerging trends.

The membership of the Board of the BOSTES could be refreshed with a view to striking a new balance between consultation and strategic oversight. The Department of Education, for example, could be ably represented by a single member, who would ensure that his or her contribution captured the collective insight and expertise of the organisation. This refreshing of the Board would be an opportunity to ensure strategic debate is informed by a range of perspectives. A more streamlined Board could be supported in its consideration of a more strategically focused agenda by an explicitly consultative representative committee structure. The committee structure could similarly be refreshed and streamlined. A refreshed committee structure could:

- Further embed an amalgamated organisation
- Provide focused forums for the sectors and BOSTES to undertake collaboratively the development of key strategies and responses to reforms, at the Board's request and for the Board's review

- Reduce unnecessary layers of governance (currently the layers of governance can significantly truncate the time stakeholders have for providing feedback on key documents, thereby compromising the consultation they evolved to support)
- Ensure a representative voice for teachers with recent classroom experience and for teachers accredited at the higher levels
- Resolve current overlap and double or triple handling of decision making (e.g. the Professional Learning Endorsement and Advisory Council and the Initial Teacher Education Committee both make recommendations to the Quality Teaching Council, which then makes recommendations to the Board; the QTC nominates members to the Moderating Consistency Committee)
- Act as a delegated approver for procedural and operational decisions where appropriate (e.g. accreditation of professional learning) – for this to work, membership of the committees would need to be at a sufficient level and endorsed by the sectors to undertake this role.

Conclusion

The overarching vision and purpose of BOSTES is to support the improvement of student learning and outcomes through a focus on teacher quality and standards. The NSW Department of Education has welcomed BOSTES's support as the Department operationalises this in NSW government schools, in the form of a high quality, high equity agenda. In this context, the Department sees the current review as an opportunity to confirm the most appropriate division of roles and responsibilities, streamline some processes to enact these and, most importantly, ensure that BOSTES has the governance structure to contribute to agile and strategic leadership by New South Wales on the national stage.