

New South Wales Vice-Chancellors' Committee

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22 April 2016

The Review Panel

Board of Studies, Teaching and Educational Standards Review

By email: bostes.review@det.nsw.edu.au

Dear Panel Members

The members of the NSW Vice-Chancellors' Committee (NSWVCC) are pleased to provide the following submission to the Review of the Board of Studies, Teaching and Educational Standards (BOSTES). The NSWVCC acknowledges, and thanks the Review Panel for the opportunity for the Convenor of the NSWVCC, Professor Andrew Vann, and Professor Barney Glover, to meet with the Panel on 7 April.

The NSWVCC, the NSW Deputy Vice-Chancellors (Academic) Committee, and the NSW Council of Deans of Education have had strong interaction with BOSTES from its inception. The President of the BOSTES, Mr Tom Alegounarias has, on several occasions, met with both the NSWVCC and the DVC (Academic) Committee, and other members of BOSTES meet with the NSW Council of Deans of Education on a regular basis. A NSWVCC nominated Vice-Chancellor sits on the Board of BOSTES, and a number of Vice-Chancellors sit on two key subcommittees:

- i) Dr Michael Spence, Vice-Chancellor of the University of Sydney is the NSWVCC nominee appointed by the Minister as a member of the BOSTES
- ii) Professor Paul Wellings Vice-Chancellor of the University of Wollongong, and Professor Greg Craven, Vice-Chancellor of the Australian Catholic University, are the NSWVCC nominee members of the BOSTES Teacher Education Policy Advisory Committee (TEPAC)
- iii) Professor Annabelle Duncan, Vice-Chancellor of the University of New England, and Professor Elizabeth Burd, PVC (Teaching & Learning) at the University of Newcastle are the NSWVCC nominee members of the BOSTES Research and Development Committee

Universities are also represented on the Quality Teaching Council (QTC), and its' sub-committee, the Initial Teacher Education Committee (ITEC):

- iv) Professor Chris Davison, Dean of Education at the University of NSW and President of the NSW Council of Deans of Education (CODE) is the nominee of CODE on the QTC
- v) Professor Andrew Parfitt, Deputy Vice-Chancellor (Academic) at the University of Newcastle is the NSWVCC representative member of the Initial Teacher Education Committee (ITEC). Also on the ITEC are university Deans in their capacity as representatives of the CODE, including Professor Chris Davison (University of NSW), Professor Peter Aubusson (University of Technology Sydney), Professor Stephen Tobias (University of New England), and Assoc. Professor Ian Brown (University of Wollongong).

As the principal providers of higher education to thousands of matriculated students of NSW schools each year, and also as the predominant providers of Initial Teacher Education programs and graduate teachers, the universities in NSW are keen to work closely with the BOSTES to ensure continuous improvement in the educational cycle.

The NSWVCC has provided detailed responses to questions raised in the BOSTES Review Discussion Paper in the following attachment, but we would like to highlight the following specific issues:

- i) **Structure:** The BOSTES and its committees could have a much clearer, and more streamlined structure, particularly in relation to responsibilities for Initial Teacher Education (ITE). This relates to both the business and process of accreditation, and to policy advice. Complexity is created by the number of committees, the number of stakeholders involved in each committee, and is further complicated by the processes universities are required to undertake to develop and implement changes to programs.
- ii) **Communication:** BOSTES board and committee membership are used as a proxy for timely and comprehensive communications between BOSTESS, the NSWVCC and its subcommittees, and the Deans of Education. This has prevented a streamlined and strategic engagement between BOSTES and the university sector, and has led to issues such as those identified in the submission, eg Board members being bound by confidentiality requirements.
- iii) **Regulatory independence:** In all other Australian jurisdictions, the bodies performing similar regulatory functions are independent statutory authorities. BOSTES was created as a Government Agency in 2013, and given specific responsibilities by the Government for implementing *Great Teaching, Inspired Learning* (GTIL) policy among other responsibilities. This has placed BOSTES in a different role to its counterparts in other states. The NSWVCC believes BOSTES could serve both the education sector and the government better if it was established in a similar manner to its counterparts in other states, allowing it to hold the position of dispassionate advisor to government, offering frank and fearless advice based on sound evidence.
- iv) **Overlap of issues and responsibilities:** There is blurring of responsibilities between the national agenda through AITSL and the NSW agenda through BOSTES. The NSWVCC would seek regulatory clarity and consistency, and supports an alignment between BOSTES's requirements and Commonwealth and COAG guidelines and standards to mitigate impacts on efficiency and cost to the sector in reporting and implementation of policy directives.

It is recommended that the committee structures, the processes for key business activities, including accreditation and quality assurance of ITE, and the mechanisms for formal communication be carefully reconsidered to optimise work flows, decision making, information exchange and the provision of high-level advice from the university sector.

We provide the following submission with the intent of seeking deeper engagement with the education system across the full life-cycle of a student, from early childhood through to graduation and beyond. Universities are committed to the highest standards of education, and the enabling of all students to reach their full potential.

Yours sincerely



Professor Andrew Vann
Convenor, NSW Vice-Chancellors' Committee
cc NSWVCC members

NSW Vice-Chancellors' Committee submission to the Review of the Board of Studies, Teaching and Educational Standards.

OVERVIEW OF NSW VICE-CHANCELLORS' COMMITTEE (NSWVCC) ISSUES

Communication and representational positions:

- i) A key issue for the higher education sector has been the ability of NSWVCC representatives to communicate issues arising from each of the BOSTES committees of which they are members, or to seek feedback from those they represent on proposed policy or process initiatives due to the strict confidentiality requirements imposed on committee members – this is particularly the case for sector representatives on the BOSTES and Quality Teaching Council (QTC) boards. *This has limited the ability of those Board members to carry out their responsibilities as a representatives and nominees of the university sector, impacting on the purpose of their places on the Boards.* Representatives on the sub-Committees have not been under such restrictions, resulting in more positive outcomes in regard to policy and procedure settings eg for the implementation of changes to entry requirements to initial teacher education (ITE) programs, and developing protocols and agreements for data sharing for research and development purposes.

Recommendation: *The NSWVCC recommends that the BOSTES review the strict confidentiality of matters affecting the higher education sector, to allow NSWVCC nominees to seek advice of the NSWVCC and/or Deans of Education on relevant matters, to allow appropriate representation, and to provide the BOSTES with the benefit of the higher education sector's expertise.*

- ii) At the beginning of 2015, universities were concerned by BOSTES's implementation processes for changes to entry requirements to ITE programs under the *Great Teaching, Inspired Learning* (GTIL) policy. Agreement was eventually reached on this issue through officers working in good faith on both sides. However, universities continue to believe the policy is flawed, particularly its exclusion of employment history and community engagement as alternative pathways into ITE, which will be to the long-term detriment of the New South Wales teaching workforce. This raises the issue of BOSTES's responsibilities as an independent agency formed to provide frank and fearless advice based on sound evidence. Through amalgamation, BOSTES is now responsible for schools which are State controlled and aspects of higher education which are regulated by the Commonwealth. BOSTES must consider decisions about ITE in higher education in the context of Commonwealth directions and the impact of conflicting decisions on higher education institutions.

It is vital that BOSTES maintains the confidence of stakeholders and establishes its position as a respected institution. BOSTES should take care to interrogate the evidentiary basis and practical implications of government policy. To this end, BOSTES must be given the research capabilities to rigorously assess policies, and provide considered advice to the government.

Recommendation: *The NSWVCC recommend that BOSTES's research capabilities be strengthened and that the Research and Development Committee of BOSTES becomes a forum where policy issues are interrogated and university collaboration sought where relevant.*

- iii) It is noted that before the amalgamation of the Board of Studies and the Institute of Teachers, the NSWVCC representative on the Board of Studies was typically a member of the universities' Committee of Chairs of Academic Boards/Senates (COCABS), as one of the principle purposes of the Board was the approval of new courses for the school curriculum. Those courses developed to be undertaken at HSC level were then considered and categorised by COCABS as either Category A subjects which are at matriculation level, and therefore considered eligible for inclusion in ATAR rankings, or Category B subjects, which have very limited eligibility for consideration for matriculation purposes. Since the establishment of BOSTES, the NSWVCC considers matters before the Board have considerably broadened from those considered by the BOS, having a strategic and policy development aspect which the NSWVCC considers to require a higher level of understanding of the sector as a whole, and particularly of the higher education sector which operates at a nationally regulated level. Increasing the participation of university representation on the BOSTES would allow universities to contribute at both a strategic, policy development level, and also at a procedural level where matters that need approval such as through the COCABS or Deans of Education could be dealt with, and matters that needed to be considered from a strategic level could be considered from a university executive level.

In parallel to the above issue, the other significant representational issue is that, on the BOSTES Board of 29 members, there is only one representative of the University/ITE provider sector. Given the emphasis of the *GTIL* policy, the emerging national emphasis on ITE and professional development programs, and the national focus on STEM uptake amongst students, it would be beneficial for the BOSTES to have a stronger representation from the higher education sector, either at senior executive level, eg DVC (Academic) and/or Dean of Education level. This would allow for greater understanding of what the higher education sector can provide for the school sector within the parameters of institutional legislative requirements, and provide insights into the most recent research around teaching and learning and cognitive sciences that would perhaps generate translational practice in the classroom, similar to the emerging research translation clinical practices that are transforming health.

Recommendation: *The NSWVCC recommends that university representation on the BOSTES be increased to at least two nominees, one at Vice-Chancellor/Deputy Vice-Chancellor level, and one at Dean of Education/Chair of Academic Board level.*

- iv) Communication and approval processes between BOSTES, its sub-committees and its stakeholders are not clear, so that agreements made in sub-committees do not necessarily appear to be communicated across the committees, and approval/implementation processes are unclear. For example, the Research and Development Committee does not appear to have seen or have approved the final draft of the Protocols and Agreements for data sharing, and the process for how these are to be implemented have not been articulated to the NSWVCC, although BOSTES is now in the process of seeking sign-off from individual universities. *Communication within BOSTES from time to time appears to be inconsistent, leaving stakeholders unclear about what agreements are in place and what processes have been established.* Large institutions such as universities cannot operate effectively with BOSTES unless clear communication lines are established.

Recommendation: *A clear process of communication with stakeholders, giving consideration to responsibility within stakeholder institutions, should be established. For example, where new agreements, policies and procedures that have strategic impact and/or have involved discussion with senior executive within institutions or peak bodies*

have been finalised, BOSTES should communicate the finalised outcomes to that senior executive for promulgation within individual institutions. To this end, it may be useful for senior executives such as Vice-Chancellors and Deans of Education to be provided with a schedule of BOSTES committee meetings and sub-committees for the year and possibly agenda circulation.

- v) Research and reporting issues: BOSTES has been given powers to collect data under its legislation, and is required to provide reports on ITE programs on a regular basis to the Minister, but it appears to have limited capacity and resources to develop robust methodologies, analyses and reports.

Recommendation: *While there have been recent improvements in the reporting process, the requirement by government for BOSTES to provide two or more reports per year on ITE programs would suggest that this capability be substantially improved or outsourced.*

- vi) The Universities have consistently requested that a program of future reports be provided to allow university staff to factor reporting and data requests into their workload. While Deans of Education are responsive and have good will for this process, ad hoc and multiple requests across each year will result in poor reporting, and not provide the considered, evidence based outcomes, recommendations and subsequent improvements that should be the result of these reports.

Recommendation: *BOSTES provide a program of future reporting areas at least a year in advance to allow for the workload and data required for collection to be factored in to ITE providers' workloads, and to provide for a timeline that will provide more considered reports.*

DISCUSSION PAPER QUESTIONS

1. Have the opportunities of the amalgamation been fully realised?

- i) **BOSTES has a clear mission and strategic focus to achieve the objectives sought by government**

The legislation establishing the BOSTES and the current policy statement as defined by the *Great Teaching, Inspired Learning Blueprint* (GTIL) has expanded the responsibilities of BOSTES beyond the original remit of both the Board of Studies and Institute of Teachers and has therefore given BOSTES a more complex and strategically focused mission, broadening the more procedural purpose of the previous agencies. However the strategic focus to achieve the outcomes of such a broad project need to be defined more clearly, possibly within BOSTES, but definitely to BOSTES' stakeholders. Clearly defined ten year, five year and annual plans would allow for better engagement and responses from stakeholders, and would allow for long term planning and innovation, rather than *ad hoc* projects which, by the limited time-frames allowed, provide only limited responses. Development and implementation of educational enhancements typically take several years to show measurable outcomes. BOSTES must be structured not only to initiate changes, but to effectively manage and measure responses to those changes to allow for maintenance and development of changes that work well, and the ability to be flexible in re-assessing changes that do not provide the outcome required, and to embed innovative teaching and learning initiatives emerging out of new knowledge and new technologies.

- ii) **There are further synergies arising from the amalgamation that remain to be achieved**

Universities would encourage closer engagement with university researchers to allow for quicker uptake on recent research in classrooms, and translation across schools where new practice has been found to be beneficial, and also in the analysis of data relating to teacher quality. BOSTES's ability to provide an "end-to-end" view of education would benefit from a systematic approach to developing a research plan that encompasses the development of an evidence base that could be used to inform work across all of its functions.

iii) There are barriers to fully realizing the full extent of these opportunities

At the moment, interaction on the introduction of research findings into professional and classroom practices is ad hoc, opportunistic and isolated, and appears to be contingent on the right person being at the right meeting. It was understood that the Research and Development Committee of BOSTES was conceptualised to be a place to raise these issues but so far the Committee appears to have concentrated on data protocols and reports on various DEC and BOSTES research projects. The agenda for this Committee is driven by BOSTES, but university representatives, particularly the Deans of Education, would welcome the chance to use this Committee to consider what strategies might be used to ascertain how the integration of new knowledge might be introduced to the professional school sector. There are some ad hoc attempts being conducted by the Deans, but a more strategic and developed process to analyse what might be feasible in this area and would be very welcome. Further, it is important that BOSTES obtain research advice not from one university but from the NSW Deans of Education as a whole, and that the research obtained represents the collective expertise of this group.

iv) There are further opportunities BOSTES could take to leverage high standards in education

Again, closer engagement with university researchers, in a not dissimilar way to the integration of researchers and practitioners in medicine and health, would allow for quicker uptake on recent research in classrooms, and translation across schools where new practice has been found to be beneficial. For example BOSTES could lead a long term research agenda for education improvement that brings together all stakeholders in effectively funded research initiatives to gather evidence and impact of NSW education policy and practices.

v) Are there areas of overlap?

The establishment of AITSL for carriage of the national agenda has resulted in duplication in several areas, particularly in regard to literacy and numeracy, admissions requirements, accreditation standards and processes, reporting and professional experience. Currently, there is an overlap relating to the literacy and numeracy test for ITE (LANTITE) and accreditation, which causes duplication of work for universities. It would provide clarity to all stakeholders in the NSW education sector if there was an agreement by BOSTES to defer to AITSL in matters AITSL have carriage over.

vi) Are there areas of blurred responsibility which affect the achievement of high standards in NSW

There is blurring of responsibility related to accreditation. If ITE programs and graduates are recognised nationally there should be clear acceptance of this from the BOSTES and

course accreditation information provided on the BOSTES website should be consistent with that provided on the AITSL website.

vii) Are there any areas of effort that should be revisited given changes to the context in which BOSTES operates?

Universities have a wide range of compliance and time restraints set by various regulatory bodies at the national level. A general principle of working cooperatively with ITE providers within that context would alleviate a number of concerns, and allow for more effective and efficient processes for all stakeholders. For example, the BOSTES processes around admission do not reflect an understanding of university timelines or processes and this is very problematic for universities. As a consequence of this disconnect, many universities have been unable to provide comprehensive information on admissions to the universities admissions centre (UAC).

viii) Business process opportunities have been fully explored following the amalgamation

ix) There are opportunities to improve the curriculum development and assessment processes

x) Changes are needed to teacher accreditation processes to effectively manage and expanded system

Universities are concerned, with the *Revised Standards and Procedures for the accreditation of initial teacher education programs in Australia* (through AITSL)¹ being implemented from this year, that NSW universities should not have a separate and additional layer of ITE program accreditation requirements that are not imposed on universities operating in other states and territories. This could be the case either in their own jurisdictions or in campuses set up in NSW. NSW universities would query how programs and graduates from institutions not subject to NSW admission to ITE programs requirements will be accredited and monitored within NSW schools.

xi) Changes are required to BOSTES school registration and accreditation processes to ensure high standards

xii) The Board and committee structure are fit for purpose

As noted above, under the BOSTES Act, the BOSTES Board consists of 29 members, including one nominee of the NSWVCC, 2 nominees of the P&C Association, 1 nominee of the CEC, 1 nominee of the AIS, 1 member of the IEU, 1 nominee of the Catholic Schools P&C, 2 principals of government schools (1 primary and 1 secondary), 2 nominees of the Teachers Federation, 1 representative of ATSI peoples, 1 person with early childhood expertise, 3 representatives of the Department of Education (experts in primary, secondary and VET), and 6 others who have expertise in primary and/or secondary education.

¹ <http://www.aitsl.edu.au/initial-teacher-education/ite-reform/accreditation>

It is noted that the legislation allows for a quorum of 12 members (or less than 50% of the full Board), and that a decision can be made by a majority of votes cast at a meeting of the Board at which a quorum is present – so in fact a decision can be made by 7 members of a Board of 29 members, or less than a quarter of the full Board.

Given the changes to the responsibilities of BOSTES, including the responsibility for accreditation of ITE programs, the assessment and provision of reports to the Minister on specific details of those programs, the increased requirements on universities to track the success of their graduates in the school system, the involvement of universities in on-going professional development of in-service teachers, the requirement of universities to 'partner' with schools particularly around professional experience placements, the development of 'demonstration' schools which require an investment of time and expertise of universities' education faculties, and the emphasis on the development of STEM courses (including the request for universities to make these subjects a requirement of admission); perhaps thought should be given to the membership of the board to reflect the deeper and integrated involvement of universities with schools, and include representatives of the NSWVCC and the NSW Deans of Education. This would allow for a more coordinated and integrated cooperative relationship, and could precipitate innovation in teaching and learning practices.

In fact, given the very broad portfolio of responsibilities of the BOSTES, a smaller, highly expert Board with sub-Committees of experts in specific areas that report back up to the BOSTES board could result in a more considered and professional outcomes. Certainly requiring a higher proportion of the Board to be present to provide a quorum should be an urgent requirement.

xiii) The governance arrangements give appropriate attention to the full range of functions of BOSTES

As per the above comments under xii.

xiv) The appropriate management structures are in place to support the functions of the agency

Engagement by BOSTES's personnel with universities' personnel have not necessarily reflected the positions arrived at in consultations, e.g. throughout negotiations on pathways for admissions to ITE programs; literacy and numeracy testing issues; and data gathering and reporting projects. This has caused confusion and often unnecessarily long delays on projects. Stronger communications processes are required to ensure a stronger collaborative and mutually supportive engagement to ensure positive and evidence based outcomes and initiatives.