

New Zealand Principals' Federation (NZPF) Submission on the Education Amendment Bill No 2

Personal Details:

Agency: New Zealand Principals' Federation (NZPF)
Designation: National Executive
Address: National Office, PO Box 25380, Wellington 6146

The New Zealand Principals' Federation (NZPF) represents the interests of 2,578 Principals of Primary, Intermediate and Secondary Schools throughout New Zealand. We thank you for the opportunity to submit our views on the Education Amendment Bill No 2 and we further request the opportunity to make an **oral presentation** to support our submission before the Education and Science Select Committee.

Introduction

NZPF welcomes the review of the New Zealand Teachers' Council and agrees that the provisions for the registration of teachers could be strengthened. In particular NZPF welcomes the shift towards independence and ownership of the Council by the profession and welcomes its focus on raising the status of the profession.

With respect to other provisions in the draft Amendment Bill, the NZPF has identified a number of concerns.

The Teaching Profession

The Bill's use of language is inconsistent, as it refers in different places to both the terms "teaching profession" and "education profession". These two terms are not interchangeable, and mean entirely different things.

A teacher is trained and registered to teach children. Teaching professionals might call on a variety of support staff, diagnostic and specialist professionals, or advisory staff such as educational psychologists, special education key workers and therapists, teacher aides, and indeed anyone who works in a school. We believe that the purpose of the Bill should be to focus exclusively on teachers, not on those performing myriad other roles.

Further, the interchangeable use of both these terms undermines the Bill's intent, as critical functions and processes are to be embedded in law expressed in contradictory terms.

Title of the Governing Board

The Principals' Federation believes that the current title should be changed to the Teaching Council of Aotearoa New Zealand, or TCANZ, reflecting the Council's role as the professional body for teachers, and clearly distancing the new council's role from other people who work in schools, but are not teachers.

Selection of the Governing Board

One of the purported purposes of the new legislation is to create an independent and professional body that is owned by the profession. The present Bill states that the appointment of the governing body will be made by the Minister who will appoint all nine members of the Council.

Whilst it specifies that five appointments must come from within the profession this fact alone does not ensure ownership, and indeed may well undermine it. The five appointments will not be freely elected by the profession thus threatening the integrity of their representational role.

The current transition board was commissioned to oversee the change from the Teachers Council to its new form. Some of the appointments made to the present transition board have already generated concerned comments from within the profession about their suitability and qualifications for such a critical role.

New Zealanders expect processes for establishing public governing bodies to be fully transparent and to follow democratic principles so that stakeholders can be confident that the Board is representative of the profession. Given that one of the stated aims of the Bill is ownership by the profession, the governing board will need to have credibility with and enjoy teachers' full support.

Indeed, educators must not only own the Council in a professional sense, but must reach into their pockets and fund it. The notion of ownership will suffer if there is no confidence in both the selection process, and the true representation of their interests.

Unless the profession has an active part in choosing its representatives, there is a high risk that the goal of professional ownership will not be achieved.

The New Zealand Principals' Federation believes that the only way to achieve professional ownership of the Council is if the Bill requires the teaching profession to nominate and elect the five candidates who will represent them.

A truly independent body is then well placed to comment on all matters within its area of interest, without fear or favour, focused purely on what is good for learners.

Partnership Schools

The failure of the legislation to clarify the registration and control of people teaching children in partnership schools is a significant contradiction to most of the stated functions listed in Sect 382 of the Bill.

These people who will work in exactly the same contexts as trained teachers, will have no legislated requirement to be registered, and the list of critical functions from which they are exempt must be seen first as a concern, and then as a contradiction of the stated goals of the new body.

Amongst these functions the most glaring contradictions and omissions include functions to:

- enhance the status of teachers and leaders:
- identify and disseminate best practice in teaching and leadership and foster the teaching profession's continued development in light of research, and evidence of changes in society and technology:
- carry out the functions under **Part 31** relating to teacher registration:
- establish and maintain criteria for teacher registration under **Part 31**:
- establish and maintain standards for qualifications that lead to teacher registration:
- conduct, in conjunction with quality assurance agencies, approvals of teacher education programmes:

- establish and maintain— standards for ongoing practice; and criteria for the issue of practising certificates:
- undertake audit and moderation of the assessment process for the issue of at least 10% of practising certificates each year:
- establish and maintain a code of conduct for teachers under **section 387**:
- monitor and enforce the requirements relating to mandatory reporting in this Part and **Part 31**:
- perform the disciplinary functions in this Part relating to teacher misconduct and reports of teacher convictions:
- set the criteria for reporting serious misconduct and for reporting on competence issues:
- perform the functions in this Part relating to teacher competence:
- co-ordinate a system providing for the vetting by the Police of all teachers:

This failure to ensure the teaching registration requirement of all persons teaching learners can only serve a political agenda and does not meet the stated policy goals of this Bill to strengthen the profession, its competence, discipline, and ethics.

Appraisal Audits

The functions previously mentioned and listed in Sec 382 include the requirement for the new Council to audit and moderate at least 10% of practising certificates each year. The objective of such a process is obvious but the unintended consequences arising from such a blunt function must be strongly challenged.

In schools which have engaged with the Best Evidence Synthesis in School Leadership and Teacher Professional Learning have in the last ten years been steadily moving towards developing and strengthening in-school appraisal processes. These often involve the de-privatisation of practice, and move teachers towards peer and instructional coaching, whole school staff development initiatives, and the creation of individual professional portfolios of evidence. This focus is designed to build teacher capability.

Any requirement to send 10% of appraisal paperwork to Wellington for audit and moderation risks shaping schools' appraisal processes to be highly portable and designed to pass audit. This threatens the integrity of much richer notions of appraisal, well founded on research evidence, which have been developing and growing in schools.

The new Council will be faced with a huge increase in workload to meaningfully engage with such an avalanche of paper, and we do not believe that a soundly based process will be readily understood by a third party studying such artefacts in isolation. This also has potential implications for the fee structure of the new Council, which ultimately will cost teachers.

Prof Michael Fullan is a noted international educational expert and was a recent visitor to the International Summit of the Teaching Profession, held here in Wellington in March. He states in his latest book, *The Principal: Three Keys to Maximising Impact*, (Page 29, Kindle Ed)

“the primary tool for improvement in any organisation is not one-to-one appraisal but rather cultures that build in learning every day and that use appraisal to supplement and strengthen the learning... If the appraisal system is perverse – that is if it becomes artificial and is not linked to clear improvement – leaders will either have to play the game or otherwise engage in something they know is inauthentic.”

The NZPF has grave concerns that the current requirement to submit 3,500 teachers' appraisal paperwork each year to the Council for audit will prove to be an expensive, inauthentic, time-consuming, and ultimately counterproductive requirement that will do nothing to meet its obvious intent.

This work might be much better handled by the Education Review Office, which is already charged with the review of schools and their processes. This would allow the Council to spend its time clearly describing the broad tenets and specific requirements of a rich and formative appraisal process, to guide that review process.

Limited Authority to Teach

From time to time schools need to appoint people to work with students who are not trained teachers. The draft legislation enables any person who considers that they have “the skills and experience appropriate to advance the learning of students or groups of students” to be granted a limited authority to teach.

Further, the legislation goes on to state that a second reason to grant a limited authority to teach is where an applicant has “the skills which are in short supply”.

The limited authority to teach is then granted to the individual, and not to the context or school with the stated need, and is therefore a transferable qualification until or unless the limited authority is cancelled. This has the potential to undermine many of the functions listed in Sect 382.

It certainly does not enhance the status of teachers, and makes a mockery of the notion of the importance of teacher training, ongoing practice and development.

Whilst we continue to recognise the need for the limited authority to teach, we believe it should be a position whose need is identified by the school in a particular context, and not granted as of right and with transferable currency to be used in a range of different schools.



Philip Harding
President



New Zealand Principals' Federation ~ Ngā Tumuaki o Aotearoa

Level 8 Bayleys Building Cnr Brandon St & Lambton Quay
PO Box 25380 Wellington 6146
P +64 (0) 4 471 2338 F +64 (0) 4 471 2339 M 027 335 6490
E philha@nzpf.ac.nz www.nzpf.ac.nz