

RESPONSE TO
THE DRAFT NATIONAL PROFESSIONAL STANDARDS FOR TEACHERS
from
THE AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS (ACTA)

21 May 2010

Table of Contents

Executive Summary	3
Introduction: ACTA, its Goals and Constituents.....	4
1. Does the preamble to the Standards give a clear picture of the context for the reason, use and purpose of the Standards?	5
2. Do the draft Standards describe a realistic and developmental teacher professional standards continuum?	9
3. Do the draft Standards reflect what you would expect teachers to know and be able to do for each of the four Levels?.....	16
4. Are there other descriptors that the Standards should include?	16
5. Will it be possible for educators to use the Standards to evaluate teacher practice (with substantive support materials)?	24
6. General comments	24

Executive Summary

The Australian Council of TESOL Associations warmly endorses the move to develop national Standards for teachers and would welcome the opportunity to provide ongoing assistance in their further development and implementation.

We believe that the three domains of teaching (Professional Knowledge, Professional Practice and Professional Engagement) are a viable way of conceptualising these Standards. The seven designated areas for describing Standards are also acceptable.

Our main concerns relate to:

1. the absence of descriptors that direct teachers' attention to the distinctive learning needs (in regard to English and the overall curriculum) of **learners of English as an additional language or dialect (EAL/D), including Aboriginal and Torres Strait Islander students who speak traditional Indigenous languages and Aboriginal English**
2. the lack of attention to **differences in teaching contexts**
3. **the *ad hoc*, abstract, additive and untheorised view of teacher development**, such that the Level descriptions are inconsistent, often arbitrary, and do not adequately reflect the realities of teacher development
4. **a lack of clarity regarding the purpose of each Level**, which makes it impossible to evaluate the descriptors
5. the intention, as we understand it, that **the *Graduate and Proficient Standards* will be implemented in 2011**, precluding the substantial revisions and further consultation that are required.

Overall, we hope that our submission will be useful in working towards the Standards' goals of improving teacher quality. However, we are concerned that the endeavour could be undermined by a lack of time for full consideration of our own and others' contributions. The danger is that inadequately formulated Standards will induce cynicism and their tokenistic application.

Supporting and improving teacher standards are foundational in the pursuit of educational excellence. This invaluable opportunity to achieve an approach that is nationally agreed and that has the support of the teaching profession should be utilised to the full.

Introduction: ACTA, its Goals and Constituents

ACTA is the national coordinating council of state and territory professional associations for the Teaching of English to Speakers of Other Languages (TESOL). Our objectives and those of our affiliates are to:

1. ensure *access to English language instruction* for speakers of other languages and dialects (Indigenous, refugee and migrant background, and international students)
2. encourage implementation and delivery of *quality professional programs* at all levels
3. promote *study, research and development of TESOL* at state, national and international levels.

Our membership comes from all educational sectors: pre-schools; schools; adult, community, TAFE and other VET settings; consultancy services in state/territory Education Departments and the Independent and Catholic sectors; and university teacher education departments. Our members teach in urban, rural and remote areas of Australia.

In the school sector, our members are specialist English as a second language (ESL) teachers of learners of English as an additional language or dialect (EAL/D), including Aboriginal and Torres Strait Islander students who speak traditional Indigenous languages and Aboriginal English. Our particular response to the draft Standards draws from our expertise regarding the role of language in learning across *all* curriculum areas as well as in designated ESL programs and classes, including for students with minimal or no literacy in their first language and severely disrupted prior schooling. We seek to improve special ESL provision for these learners as well as to enhance interactions between ESL specialist teachers, mainstream classroom teachers and other school and community-based personnel.

In what follows we address the questions that submissions have been invited to consider.

This response has the full endorsement of ACTA's constituent state and territory associations for Teaching English to Speakers of Other Languages (TESOL) in Australia.

1. Does the preamble to the Standards give a clear picture of the context for the reason, use and purpose of the Standards?

No.

Re. Context:

The preamble mentions the policy context in which the generic Standards are being developed but is inexplicit as to how the Standards will take forward key policy goals. Further, these connections seem not to have been thought through.

Specifically:

1) The preamble should elaborate precisely how the Standards relate to other policy goals and developments, most notably:

- the Melbourne Declaration on Educational Goals for Young Australians
- the Australian Curriculum (in regard to both the general capabilities and cross-curriculum dimensions as well as learning area content descriptions)
- the forthcoming Aboriginal and Torres Strait Islander Education Action Plan 2010-2014
- the National Partnership Agreement on Improving Teacher Quality
- the new Human Rights Framework education initiatives for primary and secondary schools.¹

An Appendix to the main Standards document might provide elaborations as needed.

The Standards descriptors should be audited against these other policy goals and developments.

2) The preamble should provide a factual description of the history of attempts to develop national teacher/teaching standards in Australia. An outline in the preamble could be elaborated in an Appendix.

3) The relationship envisaged between the generic Standards and previous work on Standards should be clearly explained. The draft preamble states that existing and

¹ www.deewr.gov.au/Ministers/Gillard/Media/Releases/Pages/Article_100421_141010.aspx

future work on standards “will complement” the generic Standards (p. 1). The final preamble should clearly address the following questions:

- How will the current teaching standards in use in the states and territories relate to the national generic Standards? (Many states have in place generic and specialist Professional Teaching Standards, and many of the descriptions in the state-based documents are demonstrably superior to the current set of draft Standards.)
 - Is it envisaged that existing specialist Standards should be reworked to align with the national generic Standards? (In this regard, ACTA has done extensive work on developing Standards for specialist ESL teachers, which can be found at http://www.tesol.org.au/ted/std_t.htm).
 - What scope will exist for revising the structure and content of the generic Standards to align them with existing standards developed by states and territories and professional organisations?
- 4) **The preamble should describe a clear process by which the Standards will be subject to ongoing evaluation and revision**, including how teachers can contribute to this process.
- 5) **The lack of clarity in the current draft should not be left for resolution through the support materials**. The preamble should explain the role of the proposed support materials, who will be responsible for developing them, and how consultation will occur.

Re: Rationale:

- 6) **The theoretical and research base that supports the Standards should be deepened and described more explicitly**. Current references to “research and knowledge” are general and unsubstantiated. More emphasis should be given to the ways in which teacher development hinges crucially on teachers investigating their own and others’ taken-for-granted practices. Overall, the draft preamble does not draw from what is known from extensive and long-standing research on the ways in which teachers mature and change in their professional development. The simple additive process

depicted in the draft Standards reflects the absence of a sound theoretical and research basis.

In regard to ACTA's specific concerns, the Standards and descriptors do not acknowledge or reflect long-standing and extensive research on:

- **language development** (first or other)
- **the linguistic diversity** of students in Australian schools
- **learning literacy** (in one or more languages)
- **language varieties** (notably, standard and non-standard varieties of English)
- **intercultural understanding and social inclusion.**

Culture, literacy and disadvantage may or may not overlap with language issues but they should not be assumed to be the same.

A richer, principled, more holistic and better theorised view of teacher development is required. This view should offer an understanding of the relationships between the different skills described in the Standards, should include attention to language, language learning and the use of standard and non-standard varieties of English, and should be carried forward systematically in the Level descriptors.

Re. Purpose:

- 7) **The purposes of evaluations at the four Levels are unclear.** ACTA understands from the briefing sessions attended by our representative that the *Graduate* Level Standards will be used to accredit pre-service teacher education programs and that the *Proficient* Standards will govern teacher registration. From these briefings, we also understand that achieving the *Highly Accomplished* and *Lead* Levels would be voluntary for teachers but that how these Levels will otherwise be used was open for further consideration. Information was unavailable as to whether the Standards are intended to apply to pre-school teachers, school principals and deputies, and teacher consultants.

The precise use to which each Level of the Standards will be put should be clearly stated in the preamble.

- 8) **The rationale for the sub-divisions within each Standard is unclear.** This should be clearly stated and carried through into the descriptions of each Standard.

Re. Use:

- 9) **The preamble should address the question of how these Standards will accommodate the diversity of school contexts in Australia.** This issue also requires much greater attention in the descriptors. The Standards do not seem suited for application in urban schools with high proportions of Aboriginal and Torres Strait Islander students (up to 30 per cent in some cities), or in regional and remote schools with up to 100 per cent Aboriginal and Torres Strait Islander students, or in schools with high proportions of migrants, refugees and/or recently arrived students.

For example, it is unclear how the Standards would accommodate the possibility that a teacher may be evaluated as *Highly Accomplished* (however defined) in a middle class urban school but unable to cope in a low SES inner city (or outer suburban) school or a school in rural or remote Australia. Currently initiatives are underway to encourage highly-skilled teachers to move to difficult and challenging schools. It is unclear how the Standards would acknowledge and evaluate their new learnings and inevitable back-steps, and how the rewards attaching to the Levels will take account of the different types and levels of challenge in different contexts.

Conversely, in small schools in remote and regional areas, teachers may be required to work “above” their general level. Thus newly-graduated ESL teachers are quite commonly the only ESL teachers in their school and, from the start, may be expected to design a school-wide ESL approach and collaborate in developing this approach across different year levels. Similarly, the draft Standards do not reflect the essential requirements that even newly-graduated teachers must meet in schools that work in “two-way” partnerships with Aboriginal and Torres Strait Islander educators.

- 10) **The preamble needs to acknowledge that teaching is a highly collegial, collaborative activity and that improving school performance is a collective goal.** Although as individuals teachers need to “reflect on their effectiveness, identify professional learning needs and determine career pathways”, the collaborative nature of teaching – between staff members in a school, between teachers and

students, and between schools and their communities – needs greater and more consistent attention in the preamble and in each Standard.

Other:

- 11) **The language and terminology in the preamble should be consistent with the remainder of the document** in accord with the goal of developing a “common language” for describing teacher Standards (which we endorse). See, for example, references to “knowledge, skills and dispositions”/“skills, knowledge and practice” (preamble, p. 3), and “professional knowledge, professional practice and professional engagement” (Organisation, p. 4 onwards).
- 12) **The preamble and the Standards pay insufficient attention to new developments in, the possibilities created by, and the impact of new technologies**, including the possibilities in remote and rural settings, the ways in which technology can facilitate and enhance collaborative teaching and learning, and interactions and information exchanges across the world.
- 13) The preamble and the Standards should include attention to the need for teachers to demonstrate their understanding of **the diverse modes in which texts now can take form** and the cultural and linguistic demands made by multimodal texts. Further, teachers should have the knowledge and skills to teach students to evaluate texts critically.
- 14) **Our members have also posed the following questions** relating to the use of the Standards:
 - Is it intended that schools will be required to disclose the Levels of their teachers?
 - How will teachers at the two higher levels be assessed? Will external assessors be required?
 - How will specialist expertise be assessed and who will do this?

2. Do the draft Standards describe a realistic and developmental teacher professional standards continuum?

No.

The draft descriptors are not realistic for many of the contexts in which teachers work. The depiction of professional development often appears *ad hoc*, arbitrary, decontextualised and a matter of surface wording rather than having any coherent and substantive grounding. The descriptions are additive rather than developmental. Qualifying words (such as *begins to* or *confidently*) are conspicuously absent.

As a first pass, and assuming only four Levels (but see our comments on *Proficient* Level in a dot point immediately below) and that the *Lead* Level does not describe school principals or deputies, we offer the following as a starting point for re-describing each Level:

Graduating teachers have demonstrated a capacity for working with students in planning and implementing effective teaching, learning and assessment experiences, and in assessing student learning in a highly-supported context, that is, in pre-service courses and under supervision. They can address students' learning needs in different school settings and within the context of particular curriculum frameworks. They demonstrate appropriate responses to the linguistic and cultural diversity in the classrooms and school settings they encounter. To graduate, they should demonstrate that they are establishing a capacity to work in a more autonomous mode and on a much more extended basis than during their pre-service period. While they are capable of working independently, it is also likely that there will be times when they will draw on support, guidance and the expertise of more experienced colleagues. They are able to work collaboratively with other teachers and to support other graduating teacher peers.

Proficient teachers have established their skills and confidence as effective teachers in a number of contexts (levels and types of classes), and are expanding their range of experience (levels of classes and perhaps different type(s) of schools). They are capable of designing and implementing effective teaching and assessment in familiar contexts, and expanding their skills in less familiar contexts. Their teaching and assessment practices respond effectively to the language and learning needs of diverse groups of students and individuals in their classrooms and they support these students in productive learning. They may still draw on more experienced colleagues for support to deal with particular issues. They know when to consult and seek out special expertise within and beyond the school. They understand the range and purpose of programs in their school (for example, the ESL program) and appropriately refer students to these programs. They are likely to be collaborating with and supporting their peers, pre-service student teachers, and informally supporting graduating teacher colleagues. They are increasingly making general contributions across the part of the school in which they work. They demonstrate confidence and good skills in their interactions with parents/guardians.

Highly accomplished teachers are very effective and confident teachers in their own classrooms, and have experience across a range of levels of study, types of students and probably different schools. They also work in coordinating a part of a curriculum area and/or a body of students. They have skills in coordinating learning and

assessment across part of the school, and are developing skills in leading and supporting colleagues and larger groups of students. They are involved in supporting pre-service student teachers, graduate and proficient teachers. They are also involved in systematically deepening their professional knowledge and special expertise. They demonstrate initiative, sound knowledge and good judgement in addressing the educational and related needs of their students, schools and the wider community.

Lead teachers are highly effective teachers in their own classes and across a wide range of contexts. They have skills and demonstrated successful experience in dealing with diverse students, schools, parents and communities, in leading discussions and implementing teaching and assessment strategies that cater for the diversity of their school community. They initiate and contribute to reviewing aspects of their school and implementing change, both within the school and in the school's relations with its communities. They have skills in supporting pre-service student teachers, and teachers at the other Levels. They can demonstrate substantive achievements in systematically deepening and extending the knowledge that supports their educational practice.

ACTA's criticisms of specific aspects of the current draft in relation to development across Levels are detailed below.

The theory/practice nexus and the *Graduate* Level

The *Graduate* Level in all Standards is too focussed on academic knowledge divorced from practice. It reflects a common misconception that pre-service teacher education programs are some kind of "preliminary" to practice.

If the Standards are to be used to accredit pre-service teacher education programs, a more refined understanding of how theory and practice relate to pre-service teacher education is required. Best practice in these programs takes as its starting point the practical problems, questions and strategies that beginning teachers recognise as relevant to and supportive of their initial attempts to teach. These programs should ensure that beginning teachers know about issues that directly impact on their entry into teaching, for example, the diversity of students in schools, as per Standard 1.1 (but including language diversity). They bring sound theoretical principles and up-to-date research *to bear* on how practical problems are explored and acted on. However, this does not require explicating the research itself. The responsibility for knowing and understanding current theory and research, as described in Standard 1.2, lies with those *preparing* new teachers. Further, teacher educators should know how to *apply* this knowledge appropriately in their work with pre-service student teachers. Overall in regard to research and theory, the focus of Standards for *Graduate* teachers should require them to demonstrate soundly-based practices in their teaching, and

to be able to explain these practices in a principled way, which is quite different from knowing and understanding current research in its own right.

The higher Levels should require teachers to be able to reflect critically and analytically on their own (and others') practices and principles, informed by a greater exposure to theory and research, as distinct from becoming expert researchers as seems to be implied in some of the draft descriptions.

These recommendations should not be interpreted as discounting theory and research but rather stem from on criticism of how the draft descriptors frame an understanding of theory as simply learned and later "applied" to practice.

Criticisms of the Levels: Some Examples

- It is difficult to see how many of the draft *Graduate* Level descriptors can be applied to pre-service teacher education course requirements and assessment in any systematic or coherent way, which is what will be needed if they are to be used to accredit pre-service courses (as we understand is intended).
- If the *Graduate* descriptors are to be used to accredit pre-service courses, a more precise title would be "*Graduating*", i.e., this term would denote the requirements *for a person to graduate from a pre-service program*, as distinct from what is expected of a graduate in their first and second years of teaching. (See, for example, the confusion on this point in Standard 6.3.)
- Many of the *Graduate* descriptors are inappropriate for graduating pre-school and lower school teachers – the descriptions often make impossible demands, are too academic or do not apply to teaching very young children.
- It is unclear if *Proficient* Level describes the lowest common denominator that all teachers must reach in order to be granted a teaching licence or is also supposed to apply to experienced teachers. If *Proficient* Level describes what is necessary for teacher registration, and the *Highly Accomplished* Level specifies an optional Level to which teachers may or may not choose to aspire (as was stated in the briefings), it would seem that there is no requirement for teachers to progress once they are registered (i.e., are at *Proficient* Level). Maintaining one's licence to teach should not mean that a teacher stays at the Level at which they first gained this licence. Such a

requirement would not support high professional standards. A Level is required that describes what *all* teachers should reach beyond being newly licensed.

- It is unclear whether *Lead* Level is intended to describe school principals, deputy/assistant principals, heads of department, outstanding teachers or all of these. If so, it conflates very different sets of requirements.
- In places, the *Highly Accomplished* and *Lead* descriptions seem more appropriate to teacher consultants than to classroom teachers (e.g. Standard 1, 5.3, 5.5).

Criticisms of Specific Descriptors: Some Examples

Standard 1

This Standard should reflect a more precise, consistent, inclusive and carefully formulated identification of different types of students and their characteristics. In Row 1.1, students are identified in terms of their social and cultural backgrounds (linguistic backgrounds are not covered by this identification; nor is socio-economic background), in Row 1.3, by their cognitive, social, emotional, physical and spiritual characteristics (language development – in one or more languages – is not mentioned), in Row 1.5, learner development in literacy (but not language) is the focus; in Row 1.6, as gifted/talented, with disabilities and disadvantaged (but disadvantaged is not elaborated – the Standard or the preamble or an Appendix should indicate the diverse sources of disadvantage).

Row 1.1:

- There is no substantive difference between “know and understand ... the effects” (*Graduate*) “know and understand and how to apply/use this ...” (*Proficient*), “know theoretically and practically” (*Highly Accomplished*) and knowing “how to apply knowledge to their practice” (*Lead*). ACTA recommends that *demonstrating* an understanding of diversity (social, cultural, linguistic and religious) and *applying* this in one’s teaching should be required at all Levels.
- Deferring the “ability to gather knowledge of students” to *Lead* Level could imply that teachers at other Levels simply work with stereotypes. This ability should be redescribed across all Levels and should include both informal and formal information gathering. It should also allow, for example, for the current routine requirement for many newly graduating ESL teachers to collect background data on ESL students in their schools.

Row 1.2:

Rather than “knowing and understanding ...”, those graduating from pre-service courses should be able *to demonstrate* teaching strategies that are based on sound research, and should be able to articulate the rationale for what they do with reference to *principles* based on sound research; they do not necessarily need to be able to know, understand or describe the actual research itself (see the discussion above regarding theory and practice at *Graduate* level).

Row 1.3:

The differences in Level descriptions appear to be largely a manipulation of wording (“developmental characteristics”/“stages of schooling”/“implications for teaching”/“how to address learning needs”). It seems inconsistent that in Row 1.1, *Highly Accomplished* teachers share their knowledge with colleagues but in Row 1.2, this is deferred until they are *Lead* teachers.

Row 1.6:

Requiring *Graduate* teachers to “address the learning needs of *all* students” (our emphasis) underestimates the difficulties in truly meeting this requirement. In reality, it is something all teachers struggle with throughout their professional lives, no matter how experienced they may be. In any case, addressing the learning needs of all students in one’s classroom rests as much on resourcing, class sizes and class composition as it does on individual teacher skills. The descriptors in this row should be redrafted to reflect this reality.

Standard 3

The descriptors in this Standard give no indication of the complexities of planning and implementing learning for individuals or groups of students who may vary greatly in their control of English as a first or additional language, their level of conceptual development or their prior learning. The standard should describe the capabilities of teachers who are able to plan and implement effective teaching and learning for a diverse range of students.

Standard 5

The Standard does not appear to require or encourage teachers (at any Level) to learn about and deepen their understanding of sound assessment *principles*, apply these to the

assessments they undertake, be able to analyse and critique existing assessment practices (local and beyond), and contribute to improving and reforming these practices.

Row 1.1:

It is difficult to understand the rationale for requiring *Graduate* teachers to select and use *valid* assessment strategies but deferring the use of *reliable* assessments until they are *Proficient*. (See point above re understanding assessment *principles*.)

Row 5.3:

- *Graduate* teachers, as much as any other teacher, need to be able to work with their colleagues (especially senior colleagues) to interpret assessment data. This should not be deferred until they are *Highly Accomplished*. Nor should it be optional (as we understand achieving this Level is).
- *Graduate* teachers need to be able to use assessments “to improve student learning”. This should not be deferred until they are *Proficient*.

In regard to clarity:

Row 5.5:

If the assessment tools that teachers are required to use do not yield accurate data on student knowledge and achievements – as, for example, currently occurs with literacy tests used with learners of English as an additional language or dialect – teachers cannot “maintain accurate and effective records of student achievement”. This row requires careful rewriting to reflect what is actually intended regarding *data collection* (which seems to be its actual focus).

Standard 6

This Standard should be redrafted to ensure that more than continued attendance at short, one-off PD sessions is required of teachers. It is crucial that the Standards provide encouragement for individuals and a firm basis for systems to support teachers in further studies and gaining postgraduate and specialist qualifications, for example, in teaching English as a second language, special education, counselling, leadership and across all discipline areas.

Row 6.1:

The rationale is unclear for:

- deferring Standards “to determine ... short and long term professional learning goals” to the *Highly Accomplished* Level and not requiring it of *Proficient* teachers.
- not requiring *Graduate* (and pre-service) teachers to use “key educational documents to ... evaluate their professional knowledge” and deferring it to *Proficient* Level. For example, it would appear to exempt *Graduate* (and pre-service) teachers from knowing about the Australian Curriculum.

Row 6.3:

Given that no one can graduate from a pre-service course without participating “in ongoing professional learning”, it is difficult to understand what is intended here (aside from meeting attendance requirements) for *Graduate* teachers.

Standard 7

Row 7.3

- Demonstration of the *ability* to work collaboratively should be required of all *Graduate* teachers. In some contexts, this requirement is particularly important and challenging. (For example, beginning teachers in schools with high percentages of Aboriginal and Torres Strait Islander or migrant and refugee students must be able to work in two-way partnerships with Aboriginal educators and elders, ethnic and multilingual assistants/teacher aides and other community members and agencies.)

Row 7.6

- The rationale is unclear for deferring active membership of professional associations until teachers are *Highly Accomplished*.

3. Do the draft Standards reflect what you would expect teachers to know and be able to do for each of the four Levels?

No. This question overlaps with Questions 2, 4 and 5. See our answers to these questions.

4. Are there other descriptors that the Standards should include?

Yes.

See our response to Question 1 regarding auditing the Standards against other key policy documents and development.

ACTA submits that the following issues should be acknowledged and/or given greater and more consistent attention across all Standards:

- i. English language learning
- ii. the relevance and contribution of students' other languages/varieties
- iii. fostering social inclusion and intercultural understanding
- iv. engagement with linguistically, culturally, socially and economically diverse parents/guardians and communities
- v. collaboration within the school, seeking collegial and expert support
- vi. teacher initiative, creativity, advocacy and ability to initiate change
- vii. the everyday realities of working in schools.

(i) and (ii) English language learning and students' other languages/varieties

The draft Standards give no place to requiring and encouraging teachers to attend to the English language learning needs of EAL/D learners. EAL/D learners are a major and increasing presence in Australian schools. (For example, approximately 20 per cent of, or 140 000 students in NSW government schools are learning English as a second or additional language.) These learners may be migrants, refugees (many with disrupted schooling), young students from homes where English is not used, international students and, in some states and territories, Aboriginal or Torres Strait Islanders who speak traditional Aboriginal languages and creoles. Yet others (for whom statistics are lacking) are speakers of Aboriginal English and other quite distinctive non-standard English varieties, for example, some students from West Africa and the Pacific region. They may enter school at any age or any time in the school year.

All teachers need to be able to respond to these students' learning and learning-related needs. They need to recognise when EAL/D learners should be referred to specialist ESL classes but they must also be able to work with these students in mainstream classrooms, because specialist ESL provision will not cater entirely for these students.

The Standards do not acknowledge the significance, impact and contribution of students' other languages and dialects, including traditional Indigenous languages and varieties of Aboriginal English.

Language needs are mentioned almost entirely in relation to literacy. This is not only inadequate but also perpetuates erroneous and damaging responses to EAL/D learners. For example, a focus on literacy ignores:

- EAL/D students' particular **oral English learning needs** as the foundation for English literacy (in fact, there is a vast body of research going back to the 1960s at least which shows that *all* students need to develop the spoken language associated with learning as a basis for literacy and school learning; for most EAL/D learners, this requirement is more acute)
- the possibility of students having **well-developed literacy skills in languages other than English** (i.e. teachers should not conflate English learning needs with literacy needs)
- the modes in which some EAL/D students may have **highly-developed oral language skills on which literacy can be built**. For example, some refugee and Aboriginal and Torres Strait Islander students come from societies with highly developed oral narrative traditions. Although older students may lack formal reading and writing skills, they may also have developed high level skills in, for example, song-writing and recording, photography and texting. Teachers need to be able to discover, recognise and build on these traditional and newly-emergent skills.

The descriptors for *all* Standards should be reviewed to consider whether the words *language* or *English language* should be added, and the implications of this change considered for what descriptors mean. Revisions should encourage teachers to capitalise on students' existing linguistic resources (oral and written). "Language" (as distinct from "literacy") should be included in relation to selecting content (2.2) (not just in knowing "content and how to teach it", 2.1), knowing how students learn (Standard 1), planning (Standard 3), the learning environment (Standard 4), assessment and reporting (Standard 5), professional learning (Standard 6), and the community (Standard 7).

Some specifics:

Standard 1

The requirement that teachers know "their students and how they learn" (Standard 1) cannot be divorced from knowing about students' different language backgrounds and how to respond appropriately. Teachers need to graduate with a good understanding of:

- how the pathway in learning English as a second/additional language differs in some quite significant respects from learning English as a mother tongue
- how the pathway for speakers of Aboriginal English in learning Standard Australian English and the contexts for its appropriate use also has distinctive characteristics
- the implications of these pathways for teaching and learning across the board
- how teachers' responses to students' languages and language uses impact significantly on students' emotional wellbeing, cognitive development and ability to learn.

This understanding should deepen across the Levels. The Levels should include provision for specialist knowledge of second/other language development and pedagogy.

We propose the addition of a specific descriptor, which should be elaborated and developed across the Levels. A first draft (for *Graduate* Level) is:

Demonstrate an understanding of the role of languages and literacies in the learning and identity formation of students from diverse linguistic, cultural and social backgrounds, an ability to respond appropriately to this diversity, and to plan teaching that builds positively on the knowledge and skills that students bring to the classroom.

ACTA would be pleased to work further with authorities in developing and refining this addition to Standard 1.

Row 1.1:

The word "effect" is open to negative interpretation. Linguistic diversity should also be highlighted in the descriptor, including the diversity of languages spoken by Aboriginal and Torres Strait Islander students. The descriptors should discourage stereotyping and over-generalisations. Our suggested modification (changes in italics), if the proposed additional descriptor mentioned immediately above is not accepted, is:

- *Demonstrate an understanding of the diversity of social, linguistic and cultural backgrounds of students, including Indigenous students, and an understanding of the implications for students' learning. They build on students' existing capabilities to further learning.*

Row 1.5:

Suggested modification/addition:

- *Demonstrate that they know and understand how language, literacy and numeracy development underpin student learning. They demonstrate an understanding of the foundational role of oral language in all learning and its particular implications for learners of English as an additional language or dialect (EAL/D), including Aboriginal and Torres Strait Islander students who speak traditional Indigenous languages and Aboriginal English.*

Row 1.6:

This row should be rewritten to become more realistic (see answer to Question 2 above) but also more specific – it should require teachers to develop their understanding of and responses to the specific language learning needs of learners of English as an additional language or dialect (EAL/D), including Aboriginal and Torres Strait Islander students who speak traditional languages and Aboriginal English.

Standard 5

Teachers should be required to know about special purpose assessment tools and when they should be utilised. In the case of EAL/D students, this refers to the various scales that have been developed and are used in states/territories.² They should know when to refer students for expert assessment using special purpose tools and should understand the data these tools yield. Their understanding of special purpose assessments should deepen across the Levels and with specialist training.

(iii) Fostering social inclusion and building intercultural understanding

The Standards are weak in their attention to fostering social inclusion and intercultural understanding in the classroom, school and with the wider community. Legislation in some states/territories requires all teachers to counter racism and prejudice in their classrooms and schools. The Standards should include attention to teachers developing the skills required to address racism (notably Standard 4) and to reflect on their cultural assumptions in their own teaching.

² For example: Australian Education Council. (1994). *The ESL Scales*. Carlton, Victoria: Curriculum Corporation; Department of Education and Training. (2009). *The ESL/ESD Progress Map*. Perth: West One Services; Education Queensland. (1999, 2002). *Bandscales for Aboriginal and Torres Strait Islander Learners*. Brisbane: Education Queensland; McKay, P. (Ed.). (2007). *Assessing, monitoring and understanding English as a Second Language in schools: The NLLIA ESL Bandscales Version 2*. Brisbane; NSW Department of Education and Training. (2004a). *ESL Steps: ESL Curriculum Framework K–6*. Sydney: NSW DET; NSW Department of Education and Training. (2004b). *Intensive English Programs Curriculum Framework*. Sydney: NSW DET; Northern Territory Department of Education and Training. (2002, 2009). *NT Curriculum Framework ESL Developmental Continuum*, Darwin: NT DET.

The role of teachers in assisting young people to develop a sense of belonging and identity needs greater emphasis. This emphasis should be on “intercultural” or “two-way” approaches in which different parties learn about each other, and work to reach new understandings and agreements.³ The Standards should direct and encourage teachers to work as cultural mediators in their classrooms, schools and the community.

In the classroom, the Standards should pay greater attention to teachers assisting students to explore their own and others’ languages and cultures through active engagement, and creating learning opportunities that utilise students’ existing knowledge, challenge preconceptions, and create new insights when learners reorganise and extend their existing frameworks of knowledge and belief. The Standards should include attention to communicating about linguistic and cultural differences and similarities, communicating across linguistic and cultural boundaries, recognising these boundaries and exploring why they are constructed, and critically and constructively reflecting on and questioning linguistic and cultural differences and similarities.⁴ Developing these skills is essential for participation in a culturally diverse society and require greater attention in the Standards (for example, Standards 4 and 2).

This mode of teaching requires the skills just indicated but also knowledge. Standard 2.9 should be broadened from this perspective. Teachers should have a good understanding of Australia’s history as a culturally diverse nation and its evolving cultural and linguistic diversity, including the impact of globalisation and Australia’s role in the Asia-Pacific region, in particular, and the world more generally.

(iv) Engagement with linguistically, culturally, socially and economically diverse parents/guardians and communities

The descriptors are inadequate in the attention given to the communities from which students come and potential diversity of these communities.

For example:

³ See, for example, Malcolm, I. G. and Königsberg, P. (2007) “Bridging the language gap in education.” In Leitner, G. and Malcolm, I.G. (Eds): *The Habitat of Australia’s Aboriginal Languages: Past, Present and Future*. (pp. 267-297) Berlin: Mouton de Gruyter.

⁴ Based on: Liddicoat, A., Papademetre, L., & Scarino, A. (2003). *Report on intercultural language learning*: Michelle Kohler; Lo Bianco, J., & Crozet, C. (Eds.). (2003). *Teaching invisible culture: Classroom practice and theory*. Melbourne: Language Australia; Lo Bianco, J., Liddicoat, A., & Crozet, C. (Eds.). (1999). *Striving for the third place: Intercultural competence through language education*. Melbourne: Language Australia.

- the draft Standards do not provide grounds for teachers knowing that *any* involvement by parents/guardians, including enrolling their children, might depend on the use of interpreters
- the draft Standards do not invite teachers to consider students' family situations (for example, some refugee youth are themselves heads of their households)
- the draft Standards do not require teachers to consider the effects of torture and trauma on students
- the draft Standards do not encourage teachers to draw on community members and leaders for advice and even support in the classroom.

These are real issues. Our members report – and research evidence backs them up – that these issues go unrecognised in many schools, leading to many Indigenous, migrant and refugee students being labelled as difficult, developmentally immature or “remedial”. Failure to communicate adequately with parents/guardians can also have profound effects on students' educational pathways, for example, depriving them of access to specialist ESL classes.

(v) Collaboration within the school, seeking collegial and expert support

The Standards convey an individualistic view of both teacher development and student learning.

The descriptors do not encourage or refer to the necessity for teachers to work collegially and supportively. Team-teaching, which is often the most effective way for ESL/D and mainstream teachers to collaborate, does not appear to be encouraged. Words such as *jointly plan, observe, co-teach* and *dialogue* are conspicuous by their absence.

There is no provision for judging when specific expertise may be needed in regard to particular issues, when students might be referred to special programs (for example, ESL classes), and when to seek advice from one's principal, head of department, the student counsellor, ESL teachers or other colleagues.

Greater emphasis needs to be given to working with “school support staff” who have specific linguistic and cultural expertise.

It would appear that teachers are not expected to be involved in mentoring others until they are at *Highly Accomplished* Level. This would rule out large numbers of teachers currently supervising pre-service trainees.

Similarly, the Standards do not encourage teachers to foster collaborative learning and behaviours in students. For example, Standards 1, 2 and 3 have nothing to say about encouraging students to collaborate or work in groups or, conversely, when individualised learning might be appropriate.

(vi) Teacher initiative, creativity, advocacy and ability to initiate change

The draft Standards seem focussed on conformity and implementation of current policies. They do not encourage teachers to identify issues that need attention in their schools, to take the initiative or advocate on behalf of particular student needs. These are fundamental requirements for graduating ESL teachers and apply in different ways to other teachers.

The descriptors at each Level should track how *Graduate* teachers can contribute to their school communities appropriately and constructively, and how initiative and the ability to bring about desirable changes develop as teachers mature.

(vii) The everyday realities of working in schools

Little or no attention is given to the seemingly mundane work done in and out of the classroom to build relationships with students, one's colleagues and managers, and the wider community. This work is fundamental in ensuring students' well-being, attendance and participation in education. Equally, it underpins the smooth running of a school.

Attention to this work would appropriately figure in Standards 4 and 7. Instead, Standard 4 is vague and narrowly focussed on classroom management skills as distinct from building relationships with students. It is unclear why the requirement to listen and respond positively to students is not required of *Graduate* teachers (4.3) but deferred until *Proficient* Level. The Standards should attempt to map how teachers develop balance and maturity in this regard.

This work is particularly important in schools where post-elementary students have minimal/no previous schooling, where students are socio-economically disadvantaged and in remote Indigenous communities. Many ESL teachers spend hours supporting students' basic

needs for accommodation, good health and safety, because there is no one else to do this.⁵ If the Standards do not give a place to these special demands, teachers are likely to be penalised for the time they spend in attending to them.

5. Will it be possible for educators to use the Standards to evaluate teacher practice (with substantive support materials)?

Not in any meaningful or constructive way.

The draft Standards:

- 1) would lead to tokenistic and inconsistent application
- 2) could not withstand any dispute over their application
- 3) would not clearly identify a teacher who is or is not under-performing at any given Level
- 4) would not permit distinguishing a teacher at one Level rather than another.

If these defects are not remedied, the Standards will undermine the trust in teacher evaluation that is crucial to its effectiveness and authentic teacher development.

We hope that remedying these defects has not been postponed to the development of the “substantive support materials”. The remedy should rest on the descriptors themselves, providing a clear basis on which support materials can proceed.

In short, the descriptions should be reworked to facilitate evidence-based assessment. That is, they should describe what can be observed and documented and, in some cases, measured in a credible way.

6. General comments

ACTA recommends that the Standards be comprehensively re-drafted to make them more inclusive, realistic, theoretically grounded, and hence offer a framework that truly supports and encourages quality teaching in Australian schools.

We are concerned that the current timeframe for consultation and further development will not permit this kind of revision. Such a process requires further collaborative dialogue with

⁵ A teacher described these requirements graphically in a research project undertaken by one of our members: If a student is falling asleep during class, once you start to question why, you find out that the young person has nowhere to live once they leave the classroom. Then of course because they're with you, you can't send them away to nothing. You try to get something for them. You put them on a list in a whole variety of places and try to get something for them and agitate for them and be more proactive.

professional associations, teachers and teacher educators, and greater acknowledgement of the complexity of the task at hand. We are aware that the current process has not permitted many of our members and their colleagues in schools to engage with the draft Standards document, or to appreciate its far-reaching implications, especially since they are also currently concerned in developing input on the draft Australian Curriculum. If the development of national Standards proceeds without further opportunities for reflection and dialogue with the teaching profession, we believe that they will not be effective and that significant problems may follow.

Despite these concerns, ACTA strongly endorses the national endeavour to develop Teacher Standards. We believe that our association has already made and can continue to make a constructive contribution to enhancing teaching in Australian classrooms (mainstream and specialist ESL) and the quality of students' experiences in our schools.

We therefore welcome this opportunity to make this submission. We hope it provides the basis for ongoing collaboration with colleagues and authorities in developing effective, quality Teacher Standards.
