***Consolidated Feedback on the draft Australian Teacher Performance and
Development Framework***
**Submission by
The Independent Schools Council of Australia (ISCA)**

<u>Introduction</u>

This submission is prepared in response to a request from the Australian Institute for Teaching
and School Leadership (AITSL) as part of national stakeholder consultations for the finalisation
of the *Australian Teacher Performance and Development Framework* (the Framework).

<u>Background</u>

The Independent Schools Council of Australia (ISCA) is the peak national body covering the
independent schools sector. It comprises the eight State and Territory Associations of
Independent Schools. Through these Associations, ISCA represents a sector with 1,100 schools
and around 530,000 students, accounting for 15 per cent of Australian school enrolments. Some
38% of independent schools have less than 200 students and 17% have over 1000 students.

Independent schools are a diverse group of non-government schools serving a range of different
communities. Many independent schools provide a religious or values-based education. Others
promote a particular educational philosophy or interpretation of mainstream education.
Independent schools include:

- Schools affiliated with larger and smaller Christian denominations for example, Anglican,
  Catholic, Greek Orthodox, Lutheran, Uniting Church, Seventh Day Adventist and
  Presbyterian schools

- Non-denominational Christian schools

- Islamic schools

- Jewish schools

- Montessori schools

- Rudolf Steiner schools

- Schools constituted under specific Acts of Parliament, such as grammar schools in some
  states

- Community schools

- Indigenous community schools

- Schools that specialise in meeting the needs of students with disabilities

- Schools that cater for students at severe educational risk due to a range of
  social/emotional/behavioural and other risk factors.

Independent schools are not-for-profit institutions founded by religious or other groups in the community and are registered with the relevant state or territory education authority. Most independent schools are set up and governed independently on an individual school basis.

However, some independent schools with common aims and educational philosophies are governed and administered as systems, for example the Lutheran system. Systemic schools account for 16 per cent of schools in the independent sector.

Independent Catholic schools are a significant part of the sector, accounting for 10 per cent of the independent sector's enrolments. These schools have been included in the figures above.

Response to Focus Questions

The following comments have been consolidated from feedback contributed by the state and territory Associations of Independent Schools (AIS).

> How do the proposed principles and Framework align with your current practices at the system or school level?

The unique characteristics of the Independent schooling sector, as outlined in the background section of this submission, highlights the difficulty in presenting a 'systemic' or particular 'school level' view of alignment of practices with the Framework.

In the independent sector there is a variety of approaches to teacher performance and development with some schools having highly developed processes, others with more bureaucratic approaches, and others still in early stages of development.

The broad range of educational philosophies in independent schools also underpins the different beliefs and approaches to teacher performance and development. Some schools with more developed and rigorous processes commit to regular cycles of review however this may or may not be completed on an annual basis.

There may be some similarities of management practices across some smaller systemic independent schools, however to gain greater insight into some of these practices would require consultation with each independent school.

Further devolved consultations with AIS staff and their member schools will provide more specific examples of current practices and highlight any alignments within the Framework.

> What would need to change through implementation of the Framework to create genuine improvements in teaching practice and student outcomes?

The consultation on the implementation of the Framework with schools together with the transitioning period trialling the Framework will provide key issues and discussion points around creating genuine improvements in teaching practice and student outcomes. The following points touch on some of these key considerations that may need to take place within schools.

Building a culture of trust is crucial for successful implementation of the Framework. In order to talk about performance and development there needs to be common understanding around the purpose of the process, and a clear articulation around defined roles and responsibilities of individual teachers, collegiate teams and the school leadership team.
Professional discussions around developing a shared understanding on what effective teaching is and looks like for different school contexts is also important. This also includes developing a common language around teaching, learning and assessment to underpin professional discussions.

Whether schools have had sufficient opportunity to engage with the National Professional Standards for Teachers will determine the types of conversations they have had around this. It is unclear and unknown whether all schools have had the time and support to thoroughly engage with the Standards, particularly in contexts where school size, location and levels of disadvantage can provide more immediate priorities.

Building the capacity of teachers and leadership teams to participate in a feedback cycle process, to participate in a classroom observation process and develop self reflection practices requires high quality whole school discussions around what these processes look like, a clear articulation around the roles and responsibilities of participants and may require access to training/ support to skill participants at each stage of the process.

Discussions on the role of evidence and what constitutes a sound evidence base requires elaboration at the school level. A thorough understanding of how measuring student outcomes and using data beyond NAPLAN to focus on student improvement strategies, can to lead to the greatest impact on outcomes. Conversations around the use and purpose of collecting quantitative and qualitative data, how to measure the impact of teaching on student outcomes and how to articulate this impact need time to develop common understandings.

Articulating what the individual and collective responsibilities of teachers, collegiate teams and schools are is part of a professional dialogue that underpins a common purpose in improving teaching performance and student outcomes.

The Framework

> How adequately and clearly do components of the Framework; principles, supportive school context, performance and development cycle, and outcomes of teacher performance and development, describe a comprehensive teacher performance and development approach that supports ongoing teacher improvement?

The Framework includes a number of components that would be reflected in similar teacher performance and development processes. These are not new concepts for schools that have begun to develop or have already, highly developed processes in place.

There is a tension between the collegiate nature of the profession and whether it is the responsibility of the individual or the collective for student improvement. While the Framework acknowledges the collective responsibility at the principle level it will be necessary to carefully consider what objectives and evidence would be appropriate to determine individual performance.

In *Action and Development* there is an assumption, as mentioned previously, that schools have engaged with the *National Professional Standards for Teachers* and this will determine a teacher's ability to meet the suggested expectations described in the Standards as part of the performance and development process.

The Framework assumes that the school has the capacity to participate in a performance and development cycle. For some schools (e.g. small, remote) there will be difficulties in committing to an annual cycle which will be onerous and resource intensive.

The emphasis on 'formal reviews' in the Feedback section negates the importance of regular, informal and timely feedback. Greater articulation around the role of feedback including the quality and frequency of feedback is needed to reflect the importance of giving and receiving meaningful feedback in a performance and development framework. For some schools there will need to be a shift towards a stronger culture of review of professional practice, observation and ongoing feedback.

Feedback that is balanced, behaviourally based and well evidenced using observation of teaching practice will be useful for teachers' learning and development. The quality of the conversations can make this process valuable.

There needs to be a move beyond simply being an administrative process of appraisal which is often associated with formal reviews, with a greater emphasis on the connection between appraisal and performance improvement and teacher development. It is also needs to be seen an opportunity to recognise, and where appropriate reward, teachers' efforts and successes.

> **Do the essential elements adequately describe and encompass what should be present to best serve students in all Australian schools?**

The essential elements adequately describe and encompass what should be present in a comprehensive teacher performance and development framework. Whether this will best serve students in all Australian schools is not a function of the framework but a function of the implementation of the framework in individual schools.

For some contexts, improvement in student learning will be impacted by improvements in student well-being. For some schools, student well-being (e.g. physical health, nutrition, safety) will be a first priority before any measurable improvement in student learning will be evident.

Improved school attendance or engagement of the parent/carer community will be more relevant in the first instance and yet this is not acknowledged in the outcomes for teacher performance. Increasing awareness of health and safety issues for students, engaging with students and developing relevant learning activities to improve classroom attendance, improving communication and engagement with parents and carers, are important aspects of teaching that should be acknowledged.

The question will be whether this document articulates something that some schools will feel is beyond their capability and will this impact on their ability and motivation to partake in the process. The implementation of the Framework will provide an answer to this question.

Support to schools

There are schools in the independent sector that have highly developed comprehensive processes in place and will therefore only require minor adjustments to link current practices to the Framework. In other cases there are schools that are still in the development phase of similar processes and these will be 'ready' and supportive of developing practices aligned to the Framework. There will also be some schools who may find implementation beyond the capacity of the school with resourcing and contextual factors (remote, two teacher) making the practicabilities of implementation far more difficult.

Whatever the situation or position of 'readiness' of schools to implement the Framework, requirements for resourcing/ support and expertise at the school level to develop/customise processes around the Framework appropriate to the school's need, will differ from school to school.

As acknowledged in the section 'Support to Schools' of the Framework, support for schools will be important to assist the realisation of the framework. As identified on page nine, research indicates that the implementation and culture change will provide the greatest challenges for an enduring impact.

Appraisal and feedback of teacher performance and development is a complex process as it needs to reflect the highly complex set of skills, attitudes, habits that teaching entails. The process needs to adequately reflect that complexity without over bureaucratizing the process.

Without support there is a risk that many schools will implement the Framework in a formal/structured/ bureaucratic manner and lose many of the informal measures that are currently, and should continue, to be used.

The involvement of institutions involved in Initial Teacher Education will be required to support culture change. The mindset of teacher professionalism implied by this Framework begins with ITE not just at the school site. Preparation for teaching that instils in teachers the benefits of appraisal and feedback processes will make a real and positive difference to implementation.

In the Framework, the school principal or delegate are crucial elements of the process and therefore it would be essential that school principals and their executive staff have opportunities to develop their understanding, capacity and confidence in the process as a first step.

It will be the role of School Leaders to introduce and embed a culture of development and improvement, linking broad school strategies to improve teacher performance and student outcomes, and this may take time to develop dependent on the context of the school and the level of experience of the leadership team.

It will be essential for school leaders to facilitate the alignment of overarching strategic goals with collegiate team and individual goals to ensure not only improvement in teacher performance but also student outcomes. It will be a collective process that will require the flexibility to address individual needs in regards to improvement and development.

School Leadership teams should be targeted in the first instance through professional development and appropriate support materials before teachers should engage with the specifics of the process. By modelling the process, school leadership teams will be able to demonstrate effective practice around performance and development.

Currently teachers and schools have been overwhelmed with reforms and initiatives and are dealing with impacts from these on a daily basis. The process needs to be embedded through the leadership team and it may make sense that they should receive the initial support and appropriate training to ensure a culture of improvement and development is driven initially from the top down until the processes are recognised as fit for purpose by the profession.

This does not mean however, that schools should not begin and for many continue, to have conversations around the impact of teacher performance on student outcomes, and how to improve teacher performance and student outcomes.

The following provides examples of specific levels of support that may include;

At the Association of Independent School level - Provision of professional development and on-going support to independent schools that are developing or transitioning their processes to align with the Framework will be determined by schools' participation and at the appropriate need level, based on sufficient allocated funding for this initiative.

At the school level – Leadership teams and teachers may require training and support on; understanding the process of performance and development, providing and receiving feedback, coaching and mentoring, using data to inform practices, collecting evidence against agreed objectives, identifying priorities for improvement, and conducting school based research.

Access to AITSL resources/tools may include evidence types, guides to support the process of identifying and selecting objectives, how to measure these objectives and how to participate in observation/feedback processes.

At the teacher level – Teachers may require provision of on-going support during the process such as training mentors or coaches, and time for reflective practices, setting and revisiting objectives. As identified in the Framework, 'targeted development for each teacher' will require careful resourcing by schools and may beyond the capacity of the school.

The AITSL support materials to complement the Framework would need to be timely, readily available and accessible to all schools across all contexts. In particular, to facilitate the collection of different types of evidence to provide a greater depth and understanding of performance, there needs to be the provision of specific examples of evidence whether it is provided through a database of examples or exemplars.

AITSL support materials may also include examples of different types of teacher performance and development models, particularly addressing the specific needs of small schools, remote schools and schools with particular educational philosophies.

The appropriateness of AITSL support materials will be evident through the trialling of the materials. It will be essential that any trialling involves representation of schools in differing contexts (location, levels of disadvantage, systemic/non-systemic) with differing levels of current performance and development processes in place.

Resourcing for access to quality professional development opportunities will be essential. It will require the availability of affordable, quality professional development opportunities and this may require AITSL to continue to develop appropriate learning modules or programs to facilitate teacher development and improved performance.

Additional

> How adequately and clearly does the structure and the language used make the Framework accessible to the profession?

It will be evident through consultation processes whether the structure and language is accessible or translatable to all schools in all contexts.

Schools with highly developed processes may find some comparability depending on whether they have the expertise and resources to make alignments. For schools in the early stages of developing a performance and development framework, greater support will be needed to unpack each step.

Whilst the Framework provides the overarching process, it may rely on the development of guides for schools to further unpack the processes required at the school level including a possible implementation plan to guide schools on how to start this journey. Jurisdictions may provide specific requirements within these guides however there needs to be access to this type of material as a resource for those independent schools requiring support in order to make informed, flexible, local decisions.

As part of these guides some schools may need some direction on; how to select objectives and link to appropriate evidence measures, composition of whole school priorities, team and individual priorities, how part time and specialist teachers working across schools, and casual teachers may participate in the process and what specific processes may be in place for new teachers.

There is a strong need to develop common agreement around the language used to describe teacher performance and development. Language around current practices differs across schools and jurisdictions making it difficult to clearly describe approaches for teacher performance and development. The development of a common language will be essential in a national approach.

The current Framework in its current draft form requires further changes, some in particular include;

On page two, the purpose of the Framework, *The importance of teacher performance and development*, needs to be more compelling to convince schools and educators why this Framework or what it describes is essential for the profession. OECD survey results may not be viewed as a sufficient reason to engage with the Framework. What is the evidence/research available, appropriate for Australian teachers and contexts, about the value of professional conversations around teaching, learning and development, the value of regular and timely feedback, and the link to improved student outcomes? What are the benefits to the individual and collective in participating in a performance and development process needs to be clearly articulated.

The *Principles of effective performance and development* similarly, like the purpose of the Framework, needs to be driven and supported by research and be clearly identified and referenced. There is a wealth of research that identifies key components in a performance and development process

and these should be articulated in a way that provides a compelling case for the profession. While it is acknowledged that a number of groups were commissioned by AITSL to assist in the development of the Framework, a broader research base may provide a better positioned Framework.

The *Integration with other processes* is problematic in that it may cause confusion where a number of processes (e.g. registration, promotion) are handled by different bodies, are different in process requirements and are not or likely to be integrated with the Framework. This section needs to be changed or removed for teachers to clearly see the purpose and benefits of the Framework without developing confusion and suspicion around how the Framework may be 'integrated' in current/future processes.

The language used throughout the Framework, in particular the use of 'we' (we must improve teaching, like everything we do) may not be appropriate or accepted by the profession in this type of document. The Framework has not come from the profession and although there may have been opportunities to consult with stakeholders, AITSL is not the profession and cannot assume it speaks for the profession.

The language used is also sending mixed messages around the intent of the document starting with language describing how the Framework should 'support' then 'provide guidance' but later talks quite firmly about 'monitoring and evaluating'. This confusion suggests initially that this Framework is not a mandatory process and then later in the document, that it is expected to be used as all schools will monitored and evaluated.

> Are there any critical areas of teacher performance and development that require further consideration or elaboration?

Within the Framework there needs to be a balance around considerations for further elaborations around the level of specificity and detail in the Framework as this may mandate a particular requirement for implementation.

The question of the relationship around the teacher performance/development process and teacher management practices will arise and there needs to be acknowledgement that there are processes in place for performance and management of teachers that currently exist and these processes are often modelled on state and territory requirements.

Teacher under-performance, refusal to participate fully in the process – although the Framework identifies that processes will identify underperformance and that this must relate to processes designed to manage under-performance it assumes that there is something in place that is currently effective. Whilst this is not part of AITSL's remit, the success and credibility of a management and performance framework will be reliant on the processes for managing ineffective teachers.

As identified in the Framework, the *negotiation of support to take action to meet teachers' objectives* may be resource intensive and involve access to quality professional development and services – some schools may be limited in providing such support. The question will be if the school is unable to provide the necessary 'support' what will happen?

While schools with strong and effective approaches to teacher performance and management may be already fulfilling many of the requirements of the framework, it will be essential for AITSL to understand the complexities schools that are unable to put these practices in place.

General comments

Teachers need to be able to see a well articulated overarching compelling moral purpose for a national framework with clear collective and personal benefits from participating in a performance and development process. This is not currently evident in the Framework.

If the process intends to; improve their teaching performance and student outcomes, provide opportunities to access high quality professional development, and recognise achievements and successes without having an increase in bureaucratic processes and workload, then teachers will recognise the purpose of such a framework.

It is also unclear whether the purpose of the Framework is to provide a guideline or a proposal for developing a teacher performance and development process, or as indicated by Minister Garrett in his media release, a mandatory process where *Teachers in every Australian school will have a yearly performance assessment which will include classroom observation and evidence of student outcomes.*[1]

The Framework needs to be presented to the teaching profession not as a new, additional, bureaucratic process but clearly identified as a mechanism to build on the work that currently exists in many forms across Australian schools. That for some schools the Framework will not mean any fundamental changes to what they are currently doing (and they may not wish to do so). This should also be articulated and acknowledged in the Framework.

Schools also need to clearly understand how the Framework fits in with other AITSL work on the National Professional Standards for Teachers, the National Professional Standard for Principals, and the draft Australian Charter for the Professional Learning of Teachers and School Leaders, and how links may be made with other work such as the Australian Curriculum. An overall visual perspective of how these areas of work are interrelated will provide schools a clear understanding of the position of the Framework.

It will be essential for the success of the uptake of the Framework to have a staged process to develop a culture of understanding in the principles behind a performance and development process. An acknowledgement that for some schools this will take time, years, and where schools have well developed processes in place there will need to be sufficient time to adapt, modify and align current policies if and where necessary.

The flexibility of the Framework needs to be articulated especially where schools have well developed processes in place, in relation to flexibility around the essential elements, timing/regularity of processes and levels/access of school based support.

Investment in professional development will be crucial in the sustainability of the Framework. While AITSL has been tasked to develop a number of resources and tools to support implementation processes there will be levels of expertise required to move a school in cases

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[1] Media Release: Annual performance goals for every Australian teacher, http://ministers.deewr.gov.au/garrett/annual-performance-goals-every-australian-teacher, Ministers' Media Centre, 27 April 2012.

where there is little or no teacher performance and development practices in place. AITSL will need to respond to these schools with appropriate and timely support. Consultation on the implementation of the Framework will provide greater clarity on what support schools will be seeking.

The Independent Schools Council of Australia supports the right of independent schools to implement the Framework in a manner most appropriate to the needs of their school community.

ISCA thanks the Australian Institute for Teaching and School Leadership for the opportunity to provide feedback on the draft Australian Teacher Performance and Development Framework.

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1 June 2012