

# PPTA

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NEW ZEALAND POST PRIMARY  
TEACHERS' ASSOCIATION  
TE WEHENGARUA

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[www.ppta.org.nz](http://www.ppta.org.nz)

## **SUBMISSION**

**Education Workforce Advisory Group  
Vision for the Teaching Profession**

**August 2010**

## **Introduction**

The New Zealand Post Primary Teachers' Association (PPTA) is the union representing around 18,000 teachers in state secondary, area, manual training and intermediate schools, as well as tutors in community education institutions, teachers working in alternative education centres and activity centres, and principals in secondary and area schools. PPTA has a long history of representing both the professional and the industrial interests of its members. More than 95% of eligible teachers choose to belong to the union.

The Association welcomes the opportunity to comment on the report of the Education Workforce Advisory Group, and looks forward to future engagement with us as an organisation around the issues raised and solutions identified in the report.

As a large national organisation, we are choosing to not use the provided feedback form for our response, however this submission is organised around the headings provided in the form.

## **Preliminary comments**

PPTA finds it offensive that a group hand-picked by the Minister and accountable to no-one except the Minister could purport to publish something under the title of 'A vision for the teaching profession'. This vision represents the views of its authors, but in no way does it reflect a consensus of the teaching profession.

PPTA concedes that some of the issues identified by the advisory group are issues that concern our Association also, such as most of the list of 'Judgements underpinning the group's discussions and analysis', and the recognition throughout the report that recruitment, initial teacher education, induction and mentoring, ongoing professional learning and development (PLD), development of career pathways, and support for professional leadership are key areas of focus.

PPTA has sought to make progress on all of these areas for many years. The 2003 Ministerial Taskforce on Secondary Teacher Remuneration laid out a ten-year plan for addressing many of these issues, however progress on implementing this has stalled in recent years. During the 2004-2007 STCA term, PPTA and the MOE spent many hours in workstreams on career pathways, professional development and recognition of learning, sabbatical leave, curriculum staffing, workload, and other issues. Very little progress was achieved.

It is PPTA's view that none of the proposals in the current report will have any chance of success without the government showing real support for the teaching profession, by listening to the profession, valuing and acknowledging the professional practice of teachers, and

supporting with a substantial injection of new money teachers' access to high quality PLD.

PPTA is also concerned that publication of this document at this time does not show good faith by the Ministry, in that some aspects of these proposals are also in the Ministry's claim for the Secondary Teachers' Collective Agreement negotiations, e.g. the proposal about principals having "flexibility" around units and non-contact time.

## **Initial teacher education and induction**

### ***1. The Advisory Group's proposals for initial teacher education/induction:***

#### *Proposal 1*

PPTA does not support the concept of moving initial teacher education to postgraduate level. We suggest that the real drivers for the Group's proposal for initial teacher education to be at Level 8 are self-serving for the universities. Level 8 qualifications attract higher funding from TEC, but require fewer contact hours with staff, so they can be delivered more cheaply – a benefit for the university, but a definite disadvantage for the student. They also would have the advantage of enabling universities to show 'progression' of their students from Level 7 subject-specific qualifications to Level 8 teaching qualifications.

The proposal to make initial teacher education a two-year full-time qualification (but done over three years with Years 2 and 3 part-time while teaching) is also driven by universities wanting to hold students for longer. The first two years of teaching are usually the hardest years of a teacher's career as they start to get on top of the demands of the job, and to suggest that the pressures of this be added to with tertiary study at post-graduate level is absurd and likely to lead to even higher loss rates than already exist.

The only way that PPTA could see this working would be if beginning teachers had a teaching load of no more than 12.5 hours (the minimum for teacher registration purposes) over both Year 1 and Year 2. The Advisory Group seems to have ignored the harsh realities of current secondary teacher workloads, especially around NCEA assessment.

But all that aside, PPTA must ask why the advisory group assumed that that raising the level of the qualification from 7 to 8 would lead to "high quality, capable people" entering the profession? It is not PPTA's experience that this is a factor that prospective teachers rate particularly highly. Far more important is the extent to which teachers are valued and paid and the conditions under which they work. For example, the government's pay offer to secondary school teachers, which amounts a pay cut, sends a powerful message to prospective teachers about how their skills and abilities are valued.

### *Proposal 2*

PPTA has expressed concern for many years about the development of a “bums on seats” approach to initial teacher education that focused on filling spaces and generating EFTS, rather than on meeting identified workforce needs or on ensuring quality recruitment to the profession. This arose during the 1990’s when government loosened its previous controls over initial teacher education.

PPTA supports the current work of the Teachers Council, which seeks to ensure that selection processes by initial teacher education are robust and transparent. We do support the proposal that there be controls on entry to initial teacher education to reflect workforce needs, but at secondary level this would have to be sensitive to subject needs as well as overall vacancies, something which is much harder to predict. The Ministry of Education would need to develop far more sophisticated processes for establishing workforce demands than they currently use.

In the case of secondary education, it would be extremely difficult to ascertain the number of appropriate subject-specific placements available for trainee teachers, given that every trainee has a different combination of subjects to cover in placements. We suggest that centralised control over this is simply unrealistic, but it is not unreasonable to expect teacher education providers to take cognisance of placement issues when selecting. The current situation where most secondary providers send students all over the country to find appropriate placements is uneconomic and makes it hard to maintain close relationships between providers and schools.

### *Proposal 3*

PPTA is keen to see more stringent selection processes for initial teacher education. We have protested vigorously over recent years about the trend towards selection without a visual interview, and the loss of a current practitioner voice on selection panels. We would need to more evidence, however, of what the Advisory Group saw as the kind of formal selection process that would be able to reliably assess “disposition to teach”, given that this is quite a notoriously quality to assess. On this point, as on many others, no research evidence was presented in the report.

### *Proposal 4*

PPTA supports the goal of strengthening links between teacher education providers and schools, but it is not clear in the report or the discussion document how the Advisory Group intends this to be achieved. A higher per student rate of funding for teacher education would be a good start; currently providers struggle to achieve one visit per practicum, especially in secondary where students can be placed all over the country. These visits are often fleeting, and fail to include the kind of triangulated feedback involving student, associate teachers and course lecturer that would be of real benefit. There are very few

examples of providers visiting schools hosting students to work with associate teachers about their role. Associate teachers generally work in isolation, with only written material from providers to guide them.

PPTA would be keen to see work done on providing a career pathway for teachers involved as associate teachers for student teachers and as mentors for beginning teachers. This would need to be staffed and funded with units, and, as with the Specialist Classroom Teacher career pathway, there could be funded access to post-graduate qualifications. The current rate of pay for associate teachers of \$3.19 per hour is an insult to the professionalism of teachers, and should be replaced by a rate that reflects the responsibility of the task. Currently, without these issues addressed, it is very difficult to find teachers willing to be associate teachers.

We must warn, however, that the assessment overload faced by secondary teachers in their senior classes is a further impediment to them offering to be associate teachers. Until this is addressed, they will be reluctant to hand their senior classes over to student teachers and run the risk that after the practicum they will need to use valuable time to re-teach aspects not done well by the student.

The induction and mentoring pilots being conducted by the Teachers Council are beginning to demonstrate some best practice around this work. It is important that when the pilots are concluded, the lessons from them are translated into government policy, accompanied by new money to support the work.

It is not clear what the Advisory Group meant by strengthening links between trainee and beginning teachers, however. The diagram referred to (p.13) appears to be more about initial teacher educators retaining links with their students as they move from being trainee to beginning teachers, than about links between trainee and beginning teachers. We have doubts about the practicality of this. Secondary graduates often move to take up their first position, often into rural areas especially if their subject specialism is not in high demand in urban areas. A considerable portion of the study done as a beginning teacher would have to be online, therefore, and we are dubious about whether they would receive "support" from the tertiary provider, as suggested in the diagram. PPTA cannot help but be afraid that the intention is to land even more demands on schools, without providing the necessary additional resourcing.

## ***2. Identify any other proposals in relation to initial teacher education and/or induction you think should be considered:***

### *More curriculum content*

Providers of initial teacher education for secondary teaching need to be funded to offer more subject-specific content. Over the 1990's and proliferation of secondary courses, and then with the move of almost all

secondary teacher education into universities, and with the decline in value of the teacher education per student funding, there has been less and less course time on curriculum, and more and more time in generic lectures, often for primary and early childhood students as well.

There is an absence of economies of scale for secondary teacher education that is not reflected in the per student funding; even if there are only five students training to be Geography teachers, a course must be provided. Corners are cut: practising teachers are contracted to do small chunks of teaching even though they have no teacher education expertise and lack the advanced qualifications required to assess at this level; the number of hours provided are cut; generic learning area approaches are taken, so that, for example, Geography becomes subsumed into the general area of Social Sciences, despite the fact that it has its own unique content and pedagogies.

In the 21<sup>st</sup> century there is a need for secondary teachers to be even more knowledgeable than before about the ever-expanding content of their subject area, plus about developments in subject pedagogies, and about developments in related disciplines so that they can build cross-disciplinary awareness in their students. Cutting back subject content in initial teacher education because of funding stringencies is quite the reverse of what should be happening.

Requiring secondary teacher education providers to collaborate around their course requirements so that students could study subject-specific papers through other providers using online means would help deliver economies of scale, by enabling certain providers to become specialists in particular subject areas, e.g. Technology or languages. PPTA has suggested this to providers, but always received a response about university autonomy. If this autonomy is at the expense of students being soundly prepared in their specialist areas, then it should not be allowed to continue.

#### *Restore the practitioner foundations of teacher education*

It greatly concerns PPTA that the demands of the Performance Based Research Fund (PBRF) have meant that subject specialist lecturers are losing their jobs all over the country in favour of staff who have PhDs but no background in teaching. Teacher education is a professional practice qualification, and should be delivered largely by people who have a credible background in teaching and who have held practising certificates as teachers.

PPTA recommends a change to the PBRF provisions so that a maximum of half of teacher education staff are required to be rated. It is vital that all teacher educators are 'research-informed'; it is not essential for them all to be 'research-active'.

#### *Pay student teachers during their course*

The provision of scholarships for students in hard-to-staff subjects has been a useful initiative, but the on again/off again nature of these, with subjects appearing on the list and then disappearing and then reappearing, is problematic and leads to accusations of unfairness from year to year. There are too few scholarships, and PPTA would be keen to see bonded scholarships available across the full range of subjects.

The level of remuneration from the scholarships is also still too low to ensure that people who want to teach and have the capabilities to do so can see it as a viable option. Studentships, which paid a teaching salary to student teachers and treated the initial teacher education year as the first year of service, were a common route into teaching for many of today's older secondary teachers. For current entrants into teaching, especially those who are career changers – currently about half of the teacher education students – the current levels of remuneration mean that they have to take on part-time work which can lead to inflexibilities about practicum placements and inadequate focus on the course requirements. On a studentship, a student teacher could be fully focused on their course.

There is also a need for the selection processes for these scholarships to be much more refined to reflect disposition to teach as well as academic success.

**3. *Identify any other implications in relation to initial teacher education and/or induction you think should be considered:***

Funding, funding and more funding. We note that the Advisory Group identifies funding of teacher education provision as an implication of their proposals, but we see no reference to funding of schools for their part in initial teacher education and the induction and mentoring of beginning teachers.

## **Reward, recognition and progression**

**4. *Provide comment on the proposals outlined for reward, recognition and progression:***

This was a particularly flimsy section of the report, with no evidence presented to justify any of the assertions made, for example that increased professionalism requires “greater flexibility to recognise and reward the skills and credentials that teachers have that promote learning”.

### *Proposal 1*

A long history could be written of PPTA's efforts to develop career pathways for secondary teachers, including options that do not involve moving into administrative roles. The Ministerial Taskforce on Secondary Teacher Remuneration (2003) recommended that coherent work be done by government, working with PPTA, around secondary teacher career pathways. As discussed above under 'Preliminary Comments', we have made little progress.

PPTA supports the provision of career development opportunities to support effective teaching and progression through the profession, but the MOE has spectacularly failed to make progress on career pathways work for secondary. The Specialist Classroom Teacher role is one such opportunity, however there has been only minimal increase in the number of positions, through an increase for large schools. The Senior Subject Advisor positions, successfully piloted in 2007, were another such opportunity, yet they were abolished by the Ministry of Education following an evaluation of the pilot that showed it to be highly successful.

Secondary teachers already move into a range of specialist positions such as leading e-learning in their school, pastoral care, academic counselling, careers advice, and so forth. The problem for secondary schools is that they never have enough non-contact time or units available to recognise this specialist work appropriately, nor are there clear career pathways through these positions into further positions, creating a danger that they become cul-de-sacs rather than career development opportunities.

### *Proposal 2*

Secondary principals already have flexibility to use salary units and staffing for a range of purposes, but are constrained, not by rules about their use (beyond the requirement for every teacher to have the basic five non-contacts per week) but by the size of both pools.

The competing demands on staffing of curriculum breadth, pastoral care, leadership time and school-based change initiatives mean that non-contact time is a scarce commodity and is rarely able to be used to support teacher learning even in the context of PLD initiatives like Te Kotahitanga or the Numeracy Project. The 100 Study Support Grants, which release a recipient for 4 hours per week for study purposes, are over-subscribed. It also means that there is not enough staffing available to provide non-contact time for all the teachers who take on extra responsibilities within the school. An indication of this squeeze on staffing is that there are currently about 1,000 teachers, an average of three per secondary/area school, employed out of their school's Operations Grant.

Up to 40% of the roll-generated units of a school can already be allocated on a fixed-term basis, giving principals considerable flexibility to vary their use from year to year. The basic problem is that there aren't enough for the multitude of potential uses in a busy secondary school.

The wording of Proposal 2 smacks of a covert attempt to implement 'performance pay', a policy that has been shown repeatedly overseas to have no positive effects on student achievement, and to be a barrier to the kind of collegial approaches that do help to improve achievement. PPTA policy is that all teachers should be trained, qualified and supported to remain effective in the classroom through changing contexts and responsibilities. The idea that ineffective teachers should continue to teach but be paid less is, in our view, stupid and irresponsible. Furthermore, we are surprised by the naivety of the advisory group in trusting that performance pay in schools would not be

subject to the constantly reducing cap that applies in the rest of the public sector.

The reality is that teachers do not require extrinsic motivation to do better at their jobs. PPTA has evidence that the vast majority of our members wish to have access to far more and better quality PLD, but that the main barrier is cost. Schools do not have enough money to fund individual learning to a reasonable level. Teachers in Singapore receive 100 hours (about 20 days) of funded PLD per year; in New Zealand, the average is one or two days per year. There is also a dearth of high quality PLD for secondary teachers. Most would like more help with their curriculum area, especially given the current curriculum and assessment changes, but for many there is nothing available. While there are some useful in-school PLD projects available, such as Te Kotahitanga, the Numeracy Project, the Literacy Project, and Positive Behaviour for Learning, these are all contestable and available to only a small proportion of New Zealand teachers.

### *Proposal 3*

The constant references in the report to 'standards', that they need to be "clear", "robust", etc, is yet further evidence that the writers of the report are blissfully unaware of what happens already in education. Schools are concerned that they already have to assess/appraise teachers against a multiplicity of standards: the Teachers Council's Registered Teacher Criteria that are replacing the Satisfactory Teacher Dimensions, and the professional standards in the collective agreements, including a set for unit holders as well as the three levels applying to all teachers. In certain situations the Teachers Council Code of Ethics may also have to be consulted. Associate teachers need to be aware of the Graduating Teacher Standards for their student teachers.

The report provides no evidence that this multiplicity of standards, or any standards at all, make a difference to effective teaching, let alone as to whether they would "assist in improving the attractiveness of teaching as a profession". PPTA would argue quite the converse, that the multiple ways of being measured as a teacher contribute to a sense of deprofessionalisation that stops teachers and potential teachers from seeing teaching as attractive.

## **5. Identify any other proposals you think should be considered**

### *Bring back Senior Subject Advisors*

Senior Subject Advisors are even more urgently needed for secondary schools than they were in 2007, especially since the School Support Services contract for primary schools was re-directed to National Standards work, with consequent flow-on losses in subject expertise for secondary. Only 23 positions, covering 11 subjects, were able to be created in 2007. There is a need for considerably more positions, covering the full range of subjects, except those few that are already adequately covered by some regions of School Support Services. With the recently announced re-tendering of School Support Services contracts, we anticipate that the service to secondary will become even more paltry.

*Further develop the Specialist Classroom Teacher role*

Reports from schools on the usefulness of this role have been extremely positive. Currently the role has to be very limited because for all but the largest schools there are only four hours per week made available for it, so the work is usually limited to one area, e.g. working with beginning teachers, working with teachers on a particular skill development area, etc. Increasing the number of hours of SCT time available to each school would enable further development of the role such as:

- Having more teachers working as SCTs in the school, on different areas of focus
- Using the existing SCT more intensively in their current role
- Introducing subject specialist SCTs in areas identified as needing pedagogical or curriculum development.

*Revisit the findings of the Ministerial Taskforce 2003*

The recommendations of this Taskforce were very sound and many have not yet been implemented. PPTA would be happy to continue work with the MOE within that framework.

*Significantly increase the funding for teacher PLD*

The funding available to schools is often completely used up with school-wide PLD initiatives. This leaves nothing for individuals' PLD needs, as identified through performance appraisal processes. Secondary teachers should have an entitlement to X number of PLD days per year, in addition to those provided through school-wide PLD.

But providing a funded entitlement to teachers would be little use unless the range of quality PLD available was greatly increased. For some subject areas, there is simply nothing available. Increasing funding to School Support Services would help, and adding in funding for Senior Subject Advisors (see above) would start to fill the gaps.

*Provide professional mentoring for teachers*

PPTA members have called for mentoring to be available to all secondary teachers, as a particularly powerful form of PLD. Given limited funds, the first priority area for this would be those middle and senior leadership roles. Currently there are mentoring schemes for principals, but nothing for senior and middle leaders.

**6. Identify any other implications you think should be considered:**

*Find ways to facilitate secondments*

A secondment arrangement would have been the ideal mechanism for the Senior Subject Advisor positions in 2007. It would also be a useful mechanism to enable fluid career opportunities and pathways for secondary teachers. However secondment is very difficult to organise in the Tomorrow's Schools context, because it depends on the co-operation of individual Boards of Trustees. When a secondment is being proposed, e.g. to School Support Services, it usually involves one of the school's most expert

practitioners, someone who will be hard to replace. BOTs, under Tomorrow's Schools, are encouraged to see their schools as their prime concern, and not to have concern for the health of the whole system. PPTA's experience is that even when teachers have been awarded one-year Study Awards, BOTs can prove reluctant to release them.

PPTA argued that the Senior Subject Advisor positions should be of two years duration, to ensure that advisors were not lost to the system just as they hit reached their best level of expertise. This position was rejected by STA and principal representatives because of the disadvantages for individual schools whose staff became SSAs.

## **Leadership within a school**

### ***7. Provide comment on the proposals outlined for leadership within schools***

It is somewhat confusing to identify exactly what the proposals are here, given that proposal 2 seems to be repeated as proposal 5 in the discussion document, and the five in the report are ordered differently. We also note that the writer(s) of the discussion document seems undecided as to whether to use the term 'distributive' or 'distributed' leadership for the range of leadership roles within schools. We prefer the term 'distributed' leadership, as used in the Ministry's own publication, *School Leadership and Student Outcomes: Identifying What Works and Why: Best Evidence Synthesis* (Robinson, Hohepa and Lloyd, 2009).

#### *Proposal 1*

PPTA is unable to see the necessity for requiring "compulsory" training and development for aspiring and new principals. No evidence is produced to show that new principals fail to take up the newly appointed principal programme already offered. The National Aspiring Principals Programme, when it has been offered, has been heavily subscribed, but it has been an off/off affair, having been run only twice so far, in 2008 and 2010. What is needed instead is a far greater commitment by government to making PLD for aspiring and new principals much more available.

There could be benefits in requiring that applicants for principal positions have successfully completed an aspiring principals PLD course, in that it would filter out from the pool of applicants for positions people who were manifestly unsuitable. (There is a clear problem with Boards of Trustees not always making the right choice among the applicants for a position.) On the other hand, the current size of the applicant pool for secondary principalships is so low, such a requirement might reduce some pools to zero. The policy would have to be accompanied by a number of other initiatives to increase the attractiveness of principalship and to guide and support suitable teachers over a number of years towards taking up that role.

The second part of Proposal 1, to increase support on growing distributed leadership, is vague in the extreme. PPTA would certainly like to see considerably more support for middle and senior leadership in secondary schools, and would be happy to discuss with the Ministry how this might happen. Currently there is a raft of leadership roles within secondary schools, but schools have no guaranteed access to external expertise to support these roles. School Support Services offer a limited pool of leadership and management advisers; the Ministry of Education has begun to provide web-based resources for curriculum leaders; and newly appointed Specialist Classroom Teachers can claim fees reimbursement up to \$1,000 per year for two years for post-graduate study related to their role. Apart from that, a gaping void exists. Increased emphasis on PLD at all stages of teachers' transition into leadership roles would help to prepare more teachers to eventually take on senior leadership.

#### *Proposal 2*

PPTA supports the concept of professional mentoring for all principals, and would like to see this extended to other senior leaders and to middle leaders in secondary schools. Mentoring or coaching are very powerful tools, but this would require skilled mentors/coaches to be available. The report contained no suggestions as to where this increased pool of mentors would come from. The announced abolition of the Leadership and Management positions in School Support Services in favour of secondments from the sector is a further threat to professional support for secondary school leaders. It seems likely to us that schools will end up having to pay private contractors to provide the support that they currently receive for free.

#### *Proposal 3*

PPTA has no difficulty with the goal of supporting educational leadership rather than administrative management, although both are required in most leadership positions. While we would be delighted to see more provision for administrative support for teachers in leadership positions in schools so that they can focus on educational leadership, e.g. the ability to appoint skilled property managers or financial managers or better funding for the administrative tasks associated with curriculum leadership, we would be most unhappy if this led to some leadership roles being able to be held by non-teachers. Non-teaching staff must be accountable to the professional leaders who have the final responsibility for the well-being of the school as a whole. No one would argue that the 1990s push to appoint generic managers in hospitals was a success so it is a triumph of hope over experience to be advocating the same thing for schools.

#### *Proposal 4*

Secondment to other schools as part of the PLD for aspiring principals is a splendid idea, however there are difficulties with secondment – see above under 6.

#### *Proposal 5*

We assume that this is actually Proposal 2 duplicated in error.

*Proposal 6*

PPTA's concerns about this proposal are fully covered above under Section 4, Proposal 2.

**8. Identify any other proposals you think should be considered:**

*More sabbaticals*

Currently there are 46 one-term paid sabbaticals for teachers, and 53 for principals, available across secondary and area schools. An increase in these would be beneficial to developing potential leaders, especially if they were focused on enabling aspiring leaders to spend time in designated schools of interest or on other work associated with developing their leadership potential.

*Increase funding for leadership and management advice in SSS*

There is a need for leadership and management advisors to be able to work across more schools and with more leaders within schools. Increasing the funding to SSS would be needed to ensure that this was not at the expense of other important SSS work. It would be good to see these increased places filled by current practitioners, to ensure that the advice provided is well-connected with the realities of schools today.

**9. Identify any other implications you think should be considered:**

A huge problem for secondary leadership is the small pools of applicants for the majority of positions. Principals' positions can have as few as three applicants, and schools can struggle to fill middle leadership positions. PPTA has even heard of beginning teachers ending up as middle leaders for lack of other applicants. This suggests that the proposals here for leadership and mentoring support, while valuable, will not address the whole problem.

As discussed above, there needs to be work done on ways to facilitate secondment of current practitioners into a range of advisory roles.

## **Leadership of the profession**

**10. Provide comment on the proposals relating to leadership of the profession:**

*Note: We are assuming that the discussion document contains a typo, in that this section has been headed "Provide comments on the proposals relating to leadership within schools".*

*Proposal 1*

PPTA found this section of the report the most puzzling of all. It appears that the members of the Advisory Group had only a limited grasp of the current role and work of the Teachers Council, in that they recommend a "refocusing" of the Council's role that is exactly what the Council does now.

PPTA has few difficulties with Proposal 1, because it would confine the Council to its current role of managing entry to the profession and ongoing registration (through both the approval and monitoring of teacher education courses and through its registration processes), and managing exits from the profession (through its disciplinary and competence procedures). We are happy with the current work of the Council related to these roles, e.g. its research into models for the induction and mentoring of beginning teachers, the development of new Registered Teacher Criteria, and its work on quality assurance of initial teacher education courses.

PPTA is of the view that the Council's objectives in the Education Act are somewhat broad and would merit **refinement** rather than **refocusing**, e.g. to remove the overly generic objectives (a) and (b) about professional leadership and encouraging best teaching practice, and objective (l) about identifying research priorities (except in relation to research around its core functions).

We are curious about the fact that the report had a fourth part to the "re-focused" role of NZTC, i.e. "promotion and development of the professional community of teachers", which does not appear to have made it to the discussion document. This, presumably, is what is encompassed in objectives (a) and (b) of the Act, but PPTA believes that these are too general and could lead to "adventurism" by a Council in the future, similar to what has happened in some overseas Councils that have later had to be reined in. PPTA is publishing an annual conference paper this year with a recommendation to the above effect.

The Council currently requires attestation of ongoing professional development as a condition of renewal of practising certificates, however as discussed above, secondary teachers' access to ongoing PLD is limited. Any move to specify this requirement more closely would have to be accompanied by a massive injection of extra funding for PLD, so that teachers' individual needs were able to be met, as well as school-wide priorities.

The report's assertion that "direct representation of teacher unions on NZTC may lead to emphasis on employment conditions and industrial matters rather than professional leadership" is just that, an assertion that has no basis in fact and is pure prejudice. The writers give this away by using the word "may" in this sentence, and by their failure to produce any evidence to support the assertion. Any inquiry to current and previous Council Chairs would reveal that the union representatives are held in very high regard for their commitment to the profession and for their fair-mindedness and balanced judgement. PPTA has had only two successive nominees on the Council since its inception, and both have held the role of Chair of the Professional Leadership Committee of the Council. It would appear that the members of the Advisory Group were ignorant of the fact that both PPTA and NZEI began as professional bodies to represent their education sector, and professional leadership and advocacy continues to be a highly significant part of our work.

PPTA does not share the Advisory Group's concerns about the Council's capacity and capability, and this 'implication' is not supported in any way in

the report. While the Council did have some capability difficulties in its first year or two, it is now a reasonably effective organisation.

PPTA also does not believe that significant changes need to be made to Council membership, except that there need to be two further elected positions created: one to represent secondary principals (because secondary principals are always outvoted by primary for the current principals' position) and one to represent initial teacher educators (because their work is so critical to the well-being of the teaching profession and because much of the Council's work is around them). PPTA has been reasonably satisfied with the Ministerial appointments made to date because they have all been able to contribute useful skills and knowledge from their work across the education sector, but would be considered if a future Minister began to appoint people with no education background for these roles.

***11. Identify any other proposals you think should be considered:***

*Strengthen the Council's role in approval and monitoring of teacher education*  
PPTA supports the current work of the Teachers Council in seeking to strengthen the requirements for approval and monitoring of initial teacher education. Teacher education, as discussed above, has suffered from a laissez faire approach by government since the mid-1990's, and this needs to be pulled back. The Council is the body empowered to do so, however it is struggling against university providers of teacher education whose position is "Trust us, we know what we're doing". Practitioners are unwilling to trust the universities, because of what they observe at school level. Until there is a shared commitment to some clear requirements for teacher education and proper partnership between providers and schools, this low trust environment will continue. The Council needs to be supported in its work in this area, if necessary with more legislative power.

*Legislate to change the status of the Teachers Council*

PPTA believes that the teaching profession should be given more responsibility for the Teachers Council. It is inappropriate that the Teachers Council should be the one professional body that is an autonomous crown entity. Under the Health Practitioners Competence Assurance Act 2003, the professional bodies for a wide range of professions are deemed to be statutory authorities, giving them a greater degree of independence from government. Government currently provides very little funding to the Teachers Council, and it is largely funded by teachers' registration fees. While PPTA understands that the government would have good reason to want to ensure that a high quality registration authority exists for teachers in the public sector, it could, as in the HPCA Act, simply require that it exist and define the core aspects of its role.

PPTA believes that teachers would have more confidence in a professional body that was genuinely led by the profession and was not a crown entity.

***12. Identify any other implications you think should be considered:***

The above proposal about the status of the Council would require legislative change, as would a refinement of the Council's objectives. There may also be a need for legislative change to reinforce the Council's authority over the universities in their role as providers of initial teacher education.