

**SUBMISSION COVER SHEET**



**Independent Education Union of Australia  
National Teacher Workforce Action Plan  
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## Introduction

The Independent Education Union of Australia (IEUA) welcomes the opportunity to provide feedback in relation the draft National Teacher Workforce Action Plan.

As a union of 75 000 teachers and support staff in non-government education institutions throughout Australia, our union is acutely aware of the pressures experienced by teachers and support staff in schools around the country.

The IEUA has been active in the Teacher Workforce Action Plan working party and has undertaken a round of consultation meetings with IEU members in IEUA Branches across the country. The responses contained within this submission have been informed by such member consultation.

Australia now has an opportunity to support schools through a transition to a more sustainable model of operation where they are less dependent on existing school staff, and community volunteers, taking on unrecognised, unrewarded and under remunerated work that proliferates at a pace that is inconsistent with quality outcomes.

The IEUA would argue that there is an urgent need to reconsider the functional impact of '*unrecognised*' work that goes on in schools and to correct a situation where too many schools are inadequately staffed and resourced, too many teachers are overloaded with administrative burdens and support staff, and access to allied health services, are not seen as essential to the provision of high-quality, high-equity education.

We welcome tangible and well resourced actions to rectify the current workload situations in schools and thereby address the teacher workforce crisis existing in Australian schools.

## Responses to Key Actions

### Elevating the Profession

**Objective: To recognise the value of teachers bring to students, communities and the economy**

- 1 The IEUA commends the objectives of this action.
- 2 For more than a decade, the IEU has urged Governments and jurisdictions to promote the dedication and professionalism of teachers and counteract negative perceptions circulated by the media and others.
- 3 Despite this, right wing think-tanks which influenced public and government perception of "failing teachers" have been left unchallenged; worse they have been used to construct public political dialogue and policy changes.
- 4 The factors impacting academic achievement, engagement and skill acquisition have been largely outside the control of teachers. And yet, as we have seen repeatedly, the popular remedies have been to unfairly criticise the profession, further erode teacher agency in the classroom by locking teachers into initiatives that fail to meet the needs of their students, and overload them with duplicative and unnecessary paperwork. This compounds teacher recruitment and retention issues and perpetuates a vicious cycle.

5 However, the IEUA stresses that the remedy lies in more than positive rhetoric and public discourse on teacher status.

6 The negative impacts on academic achievement, engagement and skill acquisition have been created by serious deficiencies in the quality, and implementation of government and employer initiatives with the exclusion of the profession and education unions, resulting widespread inequity issues.

7 There is a tangible mistrust of the profession by governments, policy makers which has led to negative public perceptions. This mistrust is demonstrated in the exclusion of the profession in policy determination and the decades of pressure to 'prove quality' and match unrelatable comparisons with international student outcomes through unsustainable and under resourced demands

**8 The IEUA calls for the direct inclusion of the profession and education unions in policy determination, implementation, and review in order to deliver the necessary solutions.**

## **Actions**

### **1.A targeted national campaign to raise the status and value the role of teachers.**

9 The IEUA notes that, while the provision of \$10 million towards a national campaign to showcase teachers' contributions, is not an insignificant amount of money, our members remain sceptical to any positive impact this may have when the foundations within schools remain in crisis and workload burdens left unaddressed.

**10 IEUA believes that dedicated, accountable funding on tangible actions addressing workload intensification, duplication and replication of administration tasks, burdening class sizes, stagnated pay and conditions must be the priority of the Teacher Workforce Action Plan prior to any national showcase campaign can be successfully implemented.**

11 Further, the IEUA raises concerns that the competitive nature of the non-government sector may lead to situations which may corrupt the intent of the campaign, manipulating the 'showcase' individual school achievements which have been underfunded, inappropriate resourced and unattainable in many other settings.

12 Consultation with the profession including education unions, on the mechanisms of nomination, criteria and application process is paramount to ensure that the messaging on such a campaign is relevant. Otherwise more harm will be done to the profession.

## **Action 2 Creation of new Australia Teacher of the Year**

### **Action 3 Encourage members of the public to nominate teachers for Medals of Order for Australia**

13 The IEUA recognises the intent of this action but raises significant member concerns. Teaching is a collaborative profession and activities which promote 'winners' and 'losers' go against the intent of promoting the profession.

14 There are currently a variety of 'quality teacher awards' made through various organisations and media outlets across the country.

15 It is our members' experiences that these awards do not completely reflect nor recognise the profession. Intense pressure in some cases is applied by non-government schools on teachers to make successful applications, in order to showcase and market their schools. The marketing mechanisms of the non-government school sector can not be ignored, nor overlooked when considering the implementation of such awards.

16 Such awards ultimately create *winners* and *losers* and lead to questions about those who have not been successful or not made application.

17 Such awards fail to recognise the reality that teachers do not have the time available to develop application and showcase their work and choose to use their time more constructively in developing quality resources for student learning.

#### **Action 4 Targets to increase the number of classroom teachers recognised as high achieving and highly accomplished.**

18 The current iteration of the HALT(Highly Accomplished and Lead Teacher) classification has largely been rejected by the profession, due in part to the onerous process required to achieve the credential and lack of support from employers, particularly in the non-government sector.

19 IEUA members have reported that while the non-government employers typically place significant additional demands on teachers who have achieved HALT status, these extra duties attract meagre salary outcomes and time release.

20 The IEUA believes that as such there remains significant industrial and professional issues around the HALT structures and that simply setting of targets and streamlining the application processes will not address the overall issues relating to these categories.

20 Having said this, it is readily recognised that the application process is onerous, and a review of the process is required (Refer to Action 27).

21 The IEUA believes that careful consideration must be given to ensuring that higher levels of accreditation celebrate the value of highly accomplished teachers who will remain in the classroom, with appropriate remuneration and time release attached

**22 The IEUA proposes two possible career pathways. The first providing opportunities for teachers to choose to be highly accredited as fulltime classroom practitioners where their skills are appropriately recognised and remunerated. The second, a career path that embraces instructional leadership which includes satisfactory time release in order to undertake responsibilities related to mentoring or leadership of school-based initiatives.**

23 The rationale for these two proposed career pathways is that the HALT accreditation process has traditionally carried the expectations of many schools and employers that teachers achieving accreditation at the Highly Accomplished level would automatically assume duties and responsibilities allocated to members of the leadership team without any attendant release or appropriate remuneration.

**24 The IEUA highlights the reticence of non-government employing authorities to address these issues through constructive negotiations has meant that teachers have little to no support, nor incentive to seek certification.**

### **Improving Teacher Supply**

**Objective: To increase the number of students entering Initial Teacher Education number of students completing ITE and the number of teachers staying in and/or returning to the profession**

**Action 5 More teaching places at universities in the right subjects and specialisations**

**25 The IEUA emphasises that the teacher workforce crisis reflects a complex retention crisis, not merely a failure to recruit new teachers and while opening up teacher placements is a step forward, the issues impacting on the existing workforce must be addressed to avoid perpetuation of the current crisis.**

26 In considering mechanisms to increase the number of ITE students completing their courses, it is imperative that more analysis is undertaken into understanding why this is the situation, rather than the making of assumptions of the underlying causes.

27 IEU student members have identified a lack of flexibility and appropriate support being more significant factors to completion of courses than that of access to places. While many ITE students study part-time, there is limited ability to fulfil placement requirements without significant disruption to their other lives and work. Financial support during placements was seen as a key element in increasing completion.

**28 The IEUA notes the ongoing work of the Australian Catholic University in the study on quality ITE and necessary support for student completion and further calls for studies which involve consultation with ITE students at times during their practicum and at exit.**

**Action 6 5000 bursaries worth up to \$40 000 each to help attract our best and brightest to the teaching profession**

**29 The IEUA challenges the continued reference to the ‘best and brightest’. While it may not be a deliberate attempt to denigrate those already existing in schools, it does have this impact. This language was recently used by the Federal Education Minister in Parliament in the discussion around the Teacher Workforce Action Plan. The IEUA calls for significant effort to be made by all Government and stakeholders to change this narrative.**

30 IEUA members have welcomed the concept of bursaries particularly as a mechanism to attract diversity to the profession. However, more is required.

31 IEUA members have identified that there are significant needs for additional wrap around support structures for rural and remote regions. IEUA members have cited initiatives such as Teach Rural in Victoria where there are wrapping around

services such as housing, social supports, professional development support as being a positive initiative.

32 Further, the interfacing between universities and schools must be considered and more sufficiently resourced. IEUA members have reported that there is a significant lack of recognition between preservice and the workload impact of those teachers who are supporting students in schools.

**33 The IEUA believes that appropriately resourced support for ITE students is essential throughout their professional experience periods and industrial arrangements that provide mentoring, supervision, release and reduction load for early career teachers are essential to ensure that graduates go onto have a successful career in teaching.**

34 In the non-government sector, access to induction and mentoring programs are negotiated with employers.

**35 The IEUA is firmly of the view that the current arrangements within the non-government sector regarding induction and mentoring offer inadequate support, that is evident in the high rate of attrition in early year career teachers or the failure of Initial Teacher Education students to complete their practicum and professional experience periods.**

36 Within the non-government sector, enterprise agreements provide for only for a small number of release days to be allocated to the accreditation and support process of the graduate teacher. The number of release days offered across the sector is inconsistent and can range from eight to eighteen days.

37 The IEUA contends that not only does this fail to provide sufficient time to address the significant demands of the process, they also fall well short of what is required to appropriately prepare an early career stage teacher for a successful and ongoing career.

38 These release times are typically split between graduate teacher, the employing system for inductions, and the mentor(if allocated) which further diminishes their efficacy.

39 It is also not uncommon for some of these days to remain unclaimed or of greater concern to not even be offered by the school.

40 IEUA members report not taking their release days for a number of reasons including;

- Were unaware of their entitlements;
- Felt overwhelmed by their day-to-day workload to the extent that they didn't feel comfortable taking time;
- Believed that the preparation time required to take a day off negated the actual benefit of doing so;
- Felt awkward about the time as they believe their absence would create additional work for their colleagues;
- Found it difficult to coordinate the days to coincide with their mentor (if provided) due to busy schedules;

41 This is a sorry indictment on many non-government employers and their reluctance to negotiate and to implement support structures, even were agreed to within industrial documents.

42 The IEUA believes that the structuring of a formal, conditional, accredited graduate teaching load reduction into existing staffing ratios and funding these accordingly would immediately bring remedy.

### **Action 7 1500 more places in the High Achieving Teachers Program to encourage more professionals to switch careers to teaching**

43 The IEUA questions the validity of this action, and would recommend funds be directed to investment of a structured and formal mentoring program into schools

44 Without addressing the necessary support for mid-career staff, the issues of retention will continue.

45 The IEUA believes that opportunity exists in considering the existing workforce. Contemporary workplaces are beginning to recognise the benefits that flexible work arrangements provide, not simply for individuals but for the broader school community. The prospect of a reduced teaching workload in that later career stages of a person's working life affords them the opportunity to contribute on a professional level while undertaking the many caring and other duties which often present themselves in later life.

46 As teaching has become increasingly more complex and demanding, late career stage teachers have looked to accommodate flexible arrangements through the utilisation of their long service leave at the back end of their career, a purpose for which it was not originally intended.

47 Current enterprise agreements within the non-government sector, supported by Federal industrial laws, provide for the right to request flexible work arrangements. However, while there are some successful examples of flexible work and transitional arrangements in non-government schools, in the main, the provisions for job share arrangements, part time and transition to retirement have remained mostly unimplemented. Principals have remained unsupported by the sector in finding ways to successfully implement these provisions and resorted to simply placing these requests into the 'too hard' basket, forcing staff to find other alternatives, such as resignation.

**48 The IEUA recommends the development of guaranteed transition to retirement programs, negotiated with schools and education unions to support teachers to remain renewed and energised.**

### **Action 8 Trial new ways of attracting and keeping teachers in the schools that need them the most**

#### **Rural and Remote Regions**

49 Decades of inadequate and unequal development of Australia's regions means rural and remote schools face significant challenges in attracting and retaining qualified and experienced teachers. The lack of access to wrap around services in addition to teacher placement works against the attraction of teachers into these areas. This coupled with the higher cost of living, lack of housing, the lack of access of professional support and insecure contract employment has exacerbated issues of staffing in this area.

50 Strategies must be developed and funded to counter act the isolation and provide support to teachers in these regions.

51 The IEUA also acknowledges the broader issue of recruitment and retention in challenging urban environments. While various state and territory governments have recently enhanced powers of principals to help protect teachers from outright hostility directed toward them in some settings, there remains the significant contributing factor, namely, the disengagement of school students in classrooms.

52 The IEUA believes that solving this problem requires more than increasing pressures and demands on teachers and principals.

**53 The IEUA believes that the retention of teachers with skills and experiences in working with disengaged students can only be ensured through greater provision of the additional supports (beyond classroom teachers and even beyond Teacher Aides) to engage students from disadvantaged and challenging backgrounds**

#### **Action 9 Prioritise visa processing for qualified teachers and priorities teachers from states nominated visa allocations**

**54 The IEUA believes that it is imperative that visa allocation initiatives must not undermine the professional standards of the workforce otherwise this will undermine the ultimate goal of improving teaching and learning outcomes, which are necessarily supported by a carefully designed system of teacher registration/accreditation requirements, qualification and experience recognitions, professional development requirements, induction, mentoring and ongoing support needs that ultimately are provided by the individual school and teaching staff.**

55 Further, it is essential that the employment conditions of international staff are as under the existing industrial agreements and exiting pay classification salaries and conditions are provided.

**56 The IEUA will not support the establishment of any ‘secondary category’ of visa allocated staff which receives lower conditions and pay, while still undertaking the same roles and same duties as existing staff in schools.**

57 Further in implementing such initiatives, it is essential to be mindful of the global teacher supply crisis and that the low probability that international migration will reach sufficient levels to overcome the broader retention problem. It is further essential to ensure that the impact of this actions does not result in the ‘robbing’ other countries of their skilled workforce.

#### **Action 10 The Teacher Education Expert Panel to review initial teacher education and will recommend ways to boost graduation rates .**

58 The IEUA supports the principles that there should be a range of high-quality pathways into initial teacher education (ITE) to ensure that disadvantage is not a barrier to entry, and that candidates reflecting the diversity of the community can enter the profession. There is a need for transparency and consistency in respect to entry into teacher education and the profession from multiple pathways, and for rigorous monitoring of the standard of bridging or pathway programs.



59 Further, the IEUA believes that models of initial teacher education need to be rigorous and of sufficient length to ensure that students who graduate are able to meet the Graduate Professional Teaching Standards before commencing employment as teachers.

**60 The IEUA strongly believes that a quality practicum component of ITE is crucial in the development of preservice teachers' professional skills, abilities, and confidence in responding to different educational contexts.**

**61 The IEUA believes that, to ensure a quality practicum component, professional and industrial issues must be addressed. The workload involved in taking on a preservice teacher far exceeds the time and resources allocated. It is essential that there is greater provision of time release for supervising teachers to hold reflective discussions, and greater support from universities and employers is provided.**

62 The IEUA strongly believes there needs to be a genuine, long-term commitment to recognise work of teachers and other educational professionals if we are to attract high quality candidates into initial teacher education courses.

#### **Action 11 Recognise previous study, work experience and skills that may be transferable to teaching**

63 Teaching is a regulated profession and the reasons for this is to ensure the safeguard the welling of students and the delivery of quality education.

64 The IEUA recognises that there are a range of pathways emerging that allow ITE students and mid-career entrants to join the teaching profession. The IEUA supports the need for greater diversity in the teaching workforce and supports pathways that provide alternative routes into teaching, where the pathways are addressing a specific need, are transparent and underpinned by formalised industrial agreements where they intersect with experienced practitioners in schools.

**65 The IEUA emphasises that there is a significant need to recognise the balance of content knowledge and skill and work/life experience with the quality pf pedagogical theories and practices. While a mid-career worker may have experience in a particular subject area, it will not readily transfer to quality education practices without the necessary preservice support, education and practicum opportunities.**

#### **Action 12 Co design actions to attract and retain more First Nation Teachers**

66 The IEUA welcomes this initiative and stresses that essential to this action is the appropriate and relevant consultation with First Nation communities regarding the necessary pathways. Alternative pathways which attract and retain more First Nation Teachers, where supported by transparency, accountability and industrial provisions what underpin remuneration and working conditions will deliver diversity to schools.

67 The IEUA has undertaken work that sets benchmarks for the industrial and professional working conditions of First Nations Education Workers who provide language and culture instructions in schools As part of this work , we have identified that there is room for an alternative registration process which recognises

uniqueness of Language and Culture Instruction, need for community connection and not necessarily cross over into delivery of other Australian curriculum subjects.

68 In the absence of designated positions, a cultural load is placed on First Nation teachers who are employed to deliver curriculum, but also expected to co ordinate and deliver Language and Cultural education and often pastoral support for First Nation students.

**Action 13 All teaching students will undergo initial assessment of their literacy and numeracy skills in their first years to ensure that they can receive targeted support if they require it.**

69 The IEUA recognises this a not a new initiative and has previous supported the scheduling of LANTITE earlier in ITE programs, with the onus on universities to provide additional support where needed.

### **Maximising the Time to Teach**

**Objective : To Improve retention and free up teachers to focus on teaching and collaboration**

**70 The IEUA welcomes this objective and would strongly recommend that it is given a more prominent place in the action plan, given that workload pressures are a significant cause of teacher attrition.**

71 The IEUA believes that there is an urgent need to reconsider the functional impact of '*unrecognised*' work that goes on in schools and to correct a situation where too many schools are inadequately staffed and resourced, too many teachers are overloaded with administrative burdens and support staff, and access to allied health services, are not seen as essential to the provision of high-quality, high-equity education.

**72 The IEUA strongly believes that providing teachers with sufficient release time to prepare differentiated lessons and resources is essential to ensure full and equal access to the curriculum.**

73 The relentless cycle of compliance and initiative churn driven by Federal and State Government, education system and school level culminate in many 'priorities' being juggled at once. Most require additional time or resourcing which is not provided and impacts both the success of implementation and the wellbeing of staff through significant levels of burnout and high stress. Period of significant staff shortage impact teacher's ability to find the time and intellectual capital to work through updates to curriculum study designs or the details of a new compliance or initiative requirement which will negatively impact the outcomes, despite the best efforts of those involved.

**74 The IEUA urges the governments and jurisdictions to consult on focus and ways to streamline these processes to ensure they are resourced accordingly.**

**Action 14 Pilot new approaches to reduce teacher workload through a workload reduction fund to maximise value of a teachers' time**

75 Schools are increasingly complex sociocultural environments. More initiatives are not the solution if they simply translate to more things for teachers to do and more administrative burden.

76 More careful consideration about the role of schools and role of teachers must be given. Staffing ratios must be considered and developed to ensure that teachers and support staff can engage fully with their work without constant interruption.

**77 Responsibility for reduction in workload within non-government schools lies in the hands of non-government employing authorities. The IEUA draws attention to the many current enterprise agreements which contain provisions for work impact statements and reviews of existing and developing workload requirements. (Examples of such provisions are available from the IEUA upon request.)**

78 Central to these provisions are consultation with staff to reach agreement about tasks and their resourcing. However, these provisions are ignored by many non-government employers. Worse, many non-government employers fight against their implementation by using technical and not so technical loop holes to avoid compliance.

79 The failure to implement these provisions has resulted in continuing burden of increased workload and ultimately the staff retention crisis.

**80 The IEUA further draws attention to the increasing tendency of non-government employers to add to the minimum requirements of regulatory reporting (such as NCCD reporting) and other matters. This has created an environment of replication and duplication for no tangible result to student outcomes.**

81 Responsibility for change must be accepted by non-government employers.

82 It is an unnecessary overlay to the work of teachers and while strong attempts have been made by IEUA members to work at levels determined by requirements of regulations these attempts have been overridden by the actions of non-government employers.

83 Further, the emphasis of Teacher Quality through overly intensive performance reviews such as Teacher Performance Development Frameworks, have added to the burden of paperwork and compliance and yet fail to deliver the identified and necessary professional development to the individual teachers.

84 It is now too common in non-government schools that such 'professional development analyses' are purely mechanisms of summative assessment for entire staff.

**85 In light of these current realities of implementation of policies and practices, it is imperative that the disconnect between the non-government employing authorities claims of success at the macro level is reviewed against the realities of teachers in the actual implementation of pilots and programs. The IEUA calls for inclusion of education unions in consultation on the development and review of the recommended pilot programs for workload reduction.**

**Action 15 Build on work already underway to maximise teachers' time to teach, plan and collaborate and independently evaluate the effectiveness of these measures**

**Action 16 Examine how to support implementation of the national curriculum and literacy and numeracy progressions**

**86 The IEUA calls for an urgent review of workload originating from government agencies and regulatory authorities is needed, to clarify overlays being imposed by non-government employers.**

87 All those responsible for workload issues stemming from the lack of consultation with teachers and an unwillingness to curb the relentless churn of initiatives must also be responsible for positive change.

**88 The IEUA considers the feasibility of the development of endorsed resources by expert teaching personnel that can be accessed, amended as needed by staff. However, essential to the usefulness of such resources is the need to remove the constant churn of programs/syllabi.**

**Action 17 Each initiative in the next National School Reform Agreement will be subject to a Teacher Workforce Impact Assessment**

89 The IEUA welcomes this action.

90 IEUA members have reported that *"each and every initiative ends up being carried on the shoulders of classroom teachers"*. NSFA and NPI accountability mechanisms, while desirable for transparency, have translated into increased paperwork and documentation for teachers. For example, the impact of Teacher Performance Assessment which resulted in underfunded and over intensive 12-month performance reviews did not provide the identified necessary professional development. This was due to difficulties in sourcing teacher mentors and supervisors against the backdrop of demoralisation of the profession and chronic teacher shortages and overburdening workloads

91 Genuine engagement with the profession and with education unions must be part of a transparent consultation process prior and during the implementation on any proposed National Reform Initiative

**92 The IEUA would go further in recommending a moratorium on education initiatives while the system is reconfigured to focus on actions that will alleviate workload issues.**

**Action 18 Identify the most effective use of initial teacher education students, teaching assistants and other non-teaching staff**

**93 The IEUA considers merit in this action, however, cautions the inclusion of large numbers of pre-service teachers into schools for extended periods as a mechanism for alleviating workload, shows a lack of understanding of the complex work that takes place in schools.**

94 There is a need for an audit of categories of work that could take place, mapping these to appropriate categories of worker and then staffed and resources appropriately.

95 In addition, it is essential that support for the ITE student to ensure that they can manage both course work and additional school roles effectively.

**96 With regard to utilisation of teaching assistants, the IEUA draws attention to the many non-government school enterprise agreements which industrial provisions to provide for additional roles and remuneration of support staff to alleviate the burden of the administrative duties of teachers. To date, these provisions have not been implemented by employers as there is added cost associated with increased hours and classifications.**

97 The attitude of many non-government employing authorities has been one of continuing the 'unpaid' and 'unrecognised' task burdens on teachers rather to appropriate structure and remuneration additional hours for support staff.

**Action 19 Develop and publish nationally consistent teacher workforce projections based on consistent standards, disaggregated at a regional level and by subject specialisation, to enable a national understanding of teacher demand**

**Action 20 Develop and publish national consistent ITE graduate supply data, including disaggregated by subject specialisation and participation in ITE at the regional level, to enable a national understanding of teacher supply**

98 The IEUA acknowledges the attainment of accurate data would assist in the making of informed decisions but remains cautious in the implementation of data collection at schools and whether this will be yet another task put to staff to implement.

**Action 21 Establish a National Quality Framework to guide Teacher Regulatory Authorities in teacher accreditation and ensure nationally consistent standards for initial teacher education**

99 The IEUA acknowledges the current ITE accreditation process by ATSL and Teacher Registration and that recent reforms are only now starting to filter through to improve the system. This is not necessarily the best place to expend funds and resources as a priority at the moment.

**Action 22 Priorities conditional or provisional registration to increase the supply of teachers**

100 The IEUA emphasises that processes of accreditation and registration is the essential safeguard of quality in an increasingly complex socio-cultural landscape. It is paramount that rigor in process is maintained and any attempt to weaken existing expectations to Teacher Regulatory Authorities processes will exacerbate issues of quality

**101 The IEUA remains concerned over any attempt to fast track underqualified teaching staff into schools without underpinning industrial agreements and guaranteed resource support.**

**Action 23 Develop and publish comprehensive data about why teachers leave the profession and what careers they move into and what would improve retention as well as why other career leavers choose teaching.**

102 The IEUA believes that further research is not necessary as causes are well known. Workload is the key driver of retention issues for the profession and is the easiest driver to fix when all parties are committed to reduction and change. Funding dedicated to workload mitigation is paramount.

**Action 24 Develop and support career pathways which value teacher and reflect transitions in the Australian Professional Standard for Teachers.**

103 As previously mentioned, the IEUA supports a career pathway for highly accomplished teachers which allows them to remain within the classroom as full time practitioners, unencumbered by additional duties.

**Action 25 Develop national guidelines to support early career teachers and new school leaders including mentoring and induction**

104 The IEUA supports the development of guidelines but where the implementation of guidelines are underpinned and supported through funded resources.

105 As previously mentioned, the IEU recommends a career pathway for accomplished teachers as mentors. The work of mentoring and induction takes place in the busy environment of the school. For it to be successfully implemented, it must be appropriately resourced and funded. Currently in schools, it is tagged onto other work that takes place within schools and is dependent on existing teachers taking up the roles. Workload pressures are causing such fewer such roles.

106 The IEUA recognises that members of school leadership teams are also victims of relentless compliance and initiative churn, resulting in significant levels of burnout. School or system expectations on these teachers and principals should be accompanied by appropriate support, including a proper assessment of the need and purpose of various initiatives, and the provision of adequate release time.

107 The IEUA recognises the significant challenges on school leaders, especially Principal in the current environment. We are concerned about inconsistency in the preparation and support given and the lack of a strategic approach to capacity building for individuals and leadership teams that enable them to be effective as leaders and change agents with education.

108 While initial induction processes for new leaders have improved there is still a significant shortfall in professional development and support in an ongoing and planned way. This is especially the case in relation to the complex elements such as budget, human resource management and change management. Too often it is left to the individual leader to recognise and seek out their own development

opportunities resulting in ad hoc and inconsistent experiences and results. Given the vital role of leadership within schools, the IEUA urges a greater focus on addressing this area of concern.

109 An additional complexity is that some employers have moved to a model of school leadership that encourages school leaders to remove themselves from direct engagement with their colleague teachers and instead focus on the generation of more layers of paperwork. These additional layers adversely affect teaching and learning outcomes, since they contribute to the relentless increase in compliance and documentation requirements and are destructive in terms of teacher preparation time.

**Action 26 Improve access to high – quality First Nations’ cultural competency resources to ensure teachers are better prepared to teach First Nation peoples in culturally safe ways**

**110 The IEUA strongly supports the creation of specialist First Nation Language and Culture educators in schools, linked to specialist registration scheme, rather than requiring them to follow traditional ITE pathways. Such positions creates a culture within schools where there is access to meaningful support and advice. At present, the cultural load sits with the too few First Nation Staff on top of current roles.**

**Action 27 Streamline HALT accreditation processes to make it less burden for teachers to be accredited and incorporate recognition of equivalent qualification and certification processes.**

111 As stated in Action 4, the current iteration of the HALT(Highly Accomplished and Lead Teacher) certification system has largely been rejected by the profession, due in part to the onerous process required to achieve the credential and the limited industrial and professional benefits.

112 IEUA members have also reported that the non-government employers typically place significant additional demands on teachers who have achieved HALT status which contradicts their initial purpose as ways of recognising teachers who maintain ongoing involvement in the classroom.

113 It is readily recognised that the application process is onerous. IEUA members have quoted over 80 hours spent in engaging into the process ,

114 It is an unlevel playing field where teachers who are supported by their employer have more time release and may potentially be granted time to develop application and further their career while those with less supportive employers are largely excluded from the process.

115 A streamlining of the HALT accreditation process will address the administrative burdens of application, but it will not address the underlying issues of the certification process.

**Action 28 Develop micro-credentials and expand the Quality Teaching Rounds to enhance teachers access to quality professional development**

116 The IEUA holds concerns about this action. Quality Teaching Rounds are only effective where teachers have agency and currently this is not the case. Compulsory absorption into QTR that do not meet the need of teachers, or their students are a workload intensifier and a complete waste of teacher time and school resource.