Comments on the Productivity Commission Draft Research
Schools Workforce Report

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This is a very timely report with the potential to have a significant influence on the quality of teachers and teaching in Australia. The following comments focus on Chapter 6, including Draft Finding 6.1, and Information Request 6.2 concerning establishing a performance-based career structure for teachers, as well as Draft Recommendation 6.1 concerning the proposed national bonus pay scheme.

The Commission seeks further input on what issues are likely to arise in establishing a performance-based career structure for teachers, and how those issues should be handled. This could include how to:

- Align career structures with the national teaching standards
- Design selection processes for promoting teachers to defined positions so that there is not an automatic progression based on accreditation (certification?) or qualifications
- Ensure that the career structure is cost-effective
- Phase in the career structure

These topics are addressed specifically later.

**Overall comment on Chapter 6**

Although some of the following comments may seem critical, they should be interpreted in the context of a very favourable view of the Commission’s recommendations and the thorough work that the Productivity Commission has conducted on the school workforce.

As an initial comment, it is believed that Chapter 6 would benefit from a guiding vision of teaching as a profession with greater responsibility for standards, quality assurance certification and accountability – this includes who gets into teacher education, who trains them, who gains registration and finally, who gains recognition for reaching high teaching standards. (A recent BCA report prepared by ACER provides an example of such a vision\(^1\).)

As a title for the chapter, *Teacher Performance* reflects a rather narrow managerial view about factors that promote high quality teaching in schools. “Strengthening the Teaching Profession” would be more consistent with current views about factors related to successful education systems\(^2\). This view is reflected, perhaps unintentionally, in statements such as,

> Thus, there is considerable interest in how schools and education authorities can encourage and support their teachers to become more effective.

This implies that motivation for improving the quality of teaching is regarded as something coming from outside; something done to teachers, not something that appeals to and builds upon their professionalism, whereas research indicates that the motivation that matters in

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For the most part, the assumptions about motivation for the rest of the chapter remain in this managerial frame of reference. There is considerable use of the dated language of “performance management”, with its discredited assumptions about what really motivates teachers to improve their practice (c.f. Dan Pink and his review of motivation research in his book, “Drive”). The evidence over the last 30 years is clear that performance management models (annual reviews, teacher appraisal schemes, etc.) have failed to deliver. They have failed to overcome the traditional teacher culture of privacy and territoriality. While the PC report points to this disappointing evidence, it needs to provide a clearer alternative rather than more of the same (e.g. section 6.2).

Countries that do well on international tests of student achievement have strong quality assurance mechanisms at all these stages. Teaching is held in high regard as a profession and remunerated at levels that enable teaching to compete with other professions for the best graduates (Ingvarson, in press). The chapter needs to recognise links between “teaching performance” and the academic qualities of people that current salary levels and working conditions attract into teaching. Emphasis on “teacher performance” may draw attention away from governments’ ultimate responsibility for the academic quality of people attracted, or not attracted, into teaching. When this responsibility is neglected, band-aid performance management schemes are often introduced to deal with a problem not of teachers’ creation.

Improving teacher performance is not just about tweaking old models of “performance management” at the school level; it’s about transforming teaching into a profession with professional responsibilities and professional models of accountability and recognition that can have profound effects on school functioning. Teaching has been, and still is, a powerless profession, infantilised by over 100 years of state administration. There is a strong desire among teachers to take greater responsibility for the quality of teaching, but few opportunities to exercise it. A review of the standards developed by teacher associations over the past ten years, for example shows that, when given the opportunity, teachers write challenging teaching standards.

The importance of feedback

The chapter correctly identifies that the teaching profession does not have well developed and widely used systems for providing informed and useful feedback to teachers. This is perhaps the major reason for weak links between most professional learning activities and improved student learning. As in any area of performance, from golf to writing, quality feedback is essential to learning and improved performance. However, the chapter could do more to

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explain the rationale for the standards-based professional learning and certification system that MCEEDYA has given AITSL a brief to develop. As the AITSL Chair points out

*The OECD recently conducted a comprehensive review . . . It identified the development of national standards as a positive step, but warned that they will not reach their full potential unless they are the foundation for a comprehensive career structure for teachers that links agreed standards, performance feedback and quality professional learning*.[8]

The challenge is to “get to scale” with certification so that the organisational culture of most schools encourages all teachers to seek the kind of feedback and professional learning that will help them reach profession-defined standards[9]. Recent research provides several examples of how “failing” schools can be dramatically improved when groups of teachers prepare for professional certification collaboratively in their schools[10].

Chapter 6 lists methods for gathering information for teacher appraisals, but care needs to be exercised that these methods are linked to valid teaching standards. If used alone without rubrics based on the standards and careful training of assessors, the evidence may be misinterpreted and used unfairly. There certainly will not be any comparability between one assessor and another, often the undoing of school-based appraisal schemes. These assessment methods are listed as if they are well-developed and ready for application. Most of them are not. Most will require major research, development and piloting before they will be ready for wider use, especially if used for high stakes purposes such as higher pay, promotion or dismissal. In addition, standards have not been set for any of these methods – i.e. what counts as meeting the standard, or how good a performance is good enough to meet the standard. Nor has any work been done on the relative weight that should be given to each type of assessment, if evidence from several different methods is combined.

**Career pathways and professional certification**

After examining various options for performance-based remuneration, the chapter identifies a performance-based career path with several levels as the best available. This conclusion warrants strong support, although it might be more appropriate to call it a “certification-based” or “standards-based” career path, as this recognises that good teaching depends on current professional knowledge and wider contribution to a school’s professional community as well as performance.

What might be highlighted more clearly in this chapter is that this conclusion is consistent with the current COAG/NEA on teacher quality and that establishing such a national standards-based professional learning and certification system is the brief that MCEEDYA has given to AISTL. There could be a stronger statement that supports this direction – one that also clarifies the bargain made in the partnership – that, providing AISTL comes up with a rigorous system for certifying teachers who can demonstrate that they meet the standard level, governments and other employing authorities will provide substantial incentives and remuneration to reward such teachers.

**Enhancing performance management**

As mentioned above, the chapter foregrounds performance management, which gives the impression that this is the most important avenue for influencing the quality of teaching. This is far from the case, as the chapter goes on to point out (e.g. auditor general reports reflecting the irrelevance of such schemes over the long term). Nevertheless, the chapter goes on to talk about “enhancing performance management” as if it will work better if we only try harder.

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This is a bit like flogging a dead horse. That there is a serious mismatch between the assumptions underlying “performance management” (annual reviews, appraisals, etc.), and the nature of professional work, has been clear for some time. Teachers’ work is not something that can be managed (improved) by a regime of carrots and sticks exercised by line managers. For teachers, the most important and respected source of ideas and innovations is other teachers. Peer review models of professional accountability have more potential for promoting reflection on practice and improvement.

The section on page 97-98 on teaching standards and performance management needs attention. E.g. second para: The role of the national standards is not just to underpin registration. It is to give direction to providers of teacher education programs and to guide professional development toward certification at three more levels from registration to lead teacher. The second sentence is also incorrect. Teachers are more likely to seek useful feedback from colleagues when preparing for external professional certification than when undergoing typical performance management/annual review procedures for school-based decision-making, such as retaining position, promotion, and merit pay. (The NBPTS in the USA provides extensive evidence of this.)

The next sentence reveals a misunderstanding of standards. Many research studies have found that performance management by school administrators is much more likely to be seen by teachers as an arbitrary or capricious process if it is not based on agreed and mutually understood standards. What would one base it on if not profession-defined standards? It is also incorrect to state that assessment would be based on 37 indicators. This reflects a misunderstanding of standards-based performance assessment, which is very different from the discarded competency-based assessments of the 1970s. Assessment would be based on performance on the seven standards. No one knows as yet what methods of assessment will be used and how they will be applied. What is needed is a comprehensive program of R and D and extensive piloting and trialling of assessment methods over several years before going “live” on a certification system.

National Teaching Standards Framework

Having said that, there are problems with the current content of the National Teaching Standards Framework as a basis for teachers to evaluate their practice and plan their professional learning. The standards need further elaboration and development for each of the specialist fields that make up the teaching profession before they can be used for assessment purposes.

The current Framework aims to identify standards at four levels: Graduate Teacher; Proficient Teacher (which in practice means Registered Teacher); Highly Accomplished Teacher; and Lead Teacher. On inspection, it becomes clear that the Framework tries to do two things at

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The first aim is to try to describe what counts as increasing expertise in teaching; what a teacher is expected to know and be able to do and what counts as development or improvement in a teacher’s capabilities – a deepening of expertise, as it were. The framework fails to do this. The second is to describe different jobs or positions of responsibility with a particular employer. The Framework does this by talking in terms of what Graduate Teachers *know*, what Proficient Teachers *apply*, what Accomplished Teachers *share* and what Lead Teachers *lead*. These words do not describe increasing expertise as a teacher.\[15\]

The latter purpose dominates the Framework. For this reason, the descriptors at each level get longer and longer. The sequence for each element is much the same; they progress in terms of what Graduate teachers “know”, what Proficient teachers do, or “apply”; what Highly Accomplished teachers “share”; or and what Lead teachers, “initiate” or “model”.

That is, the standards do not seem to address the fundamental question of what it means to develop deeper knowledge and understanding and more expert practice as a teacher. It does not identify clearly what counts as increasing expertise as a teacher, and to that extent it is less than useful than it could be to provide a guide as to what good teachers should get even better at.

The framework confuses levels of professional expertise and certification with roles or jobs in particular school systems. For example, the NSW Education Department has created a limited quota of positions for “Highly Accomplished Teachers” in schools. The concept of a portable professional level of certification in the National Standards Framework has been converted into a position in a school for which teachers apply. This approach will minimise the beneficial effects of a certification system.

The first sentence of the next paragraph on page 98 presents a similar misinterpretation of standards. Professional standards do not describe the “ideal” teacher or practice. They describe what all teachers should know and be able to do to graduate, to gain full entry to the profession, to attain high standards expected of all teachers with appropriate professional development. A standard is not completely defined until three steps are clear:

1. Defining what is to be assessed – i.e. what do highly accomplished teachers know and do. (This is what the National Professional Standards for Teachers in Australia aim to do. These are often called *content* standards);

2. Developing valid and consistent methods for gathering evidence about what a teacher knows and is able to do in relation to the standards; and

3. Developing reliable procedures for assessing that evidence and deciding whether a teacher has met the standard. (This will depend on developing *performance* standards in addition to *content* standards).

Box 6.3 gives a dangerous impression that Step 1 can be ignored. It suggests a list of methods for appraising teachers, but there is no indication of which standards they assess (i.e. what is

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being appraised), what the purpose of the appraisal is (e.g. retaining your job, PD, promotion, bonuses?), or how they are can be used in ways that are valid, reliable and fair. As indicated above, developing valid methods of teacher evaluation is a complex business – the danger with this box is that it suggests Australia has such methods already and they can just be taken off the shelf and applied.

**Box 6.6:**
Box 6.6 provides a summary of high selected evidence related to performance-based pay for teachers. It needs to be clear that this Box includes only a limited range of performance-based pay schemes. While it becomes clear that this Box refers only to one-off bonus pay schemes, it should be clear that it only includes schemes based mainly on student outcomes from standardised tests. This by no means a sound way or the only way to measure teacher performance. The Box contains a highly selective set of studies, most of which are simply not representative of the Australian context. Evidence is mounting from several major recent studies that value-added modelling is an invalid and unreliable method for discriminating between teachers. It is suggest that this box be deleted. If a box like this is included, it provide a much more representative review of the evidence.

Standards-based certification schemes, such as the NBPTS are also based on performance, but a broader conception of “performance”. Note: NBPTS certification is the most widely used basis for performance-based pay in the USA. (See Podgursky in Springer, M.G. (Ed.) (2009). *Performance Incentives: Their Growing Impact on American k-12 Education.* Washington D.C.: Brookings Institution Press.)

**Productivity and the quality of teaching**

Chapter 6 is central to issues concerning the quality and productivity of Australia’s school system. However, it needs an underlying theme to strengthen its coherence. There is no mention of strengthening teaching as a profession and vesting teachers with more responsibility for quality assurance, peer review and professional modes of accountability. Recent OECD reports point out that

_To provide high-quality education to the broader population, education systems must recruit their teachers from the top of the higher education pool. But top graduates tend to find Tayloristic workplaces such as school systems using bureaucratic command-and-control systems to be unappealing options. To attract the best graduates to the teaching profession, these systems need to transform the work organisation in their schools to an environment in which professional norms of control replace bureaucratic and administrative forms of control._ (OECD, 2010, p.17)

And,

_In many high-performing education systems teachers do not only have a central role to play in improving educational outcomes, they are also at the centre of the improvement efforts themselves. In these systems it is not that top-down reforms are ordering teachers to change, but that teachers embrace and lead reform, taking responsibility as professionals . . . _ (OECD, 2010, p.18)

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As the Productivity Commission Report recognises, countries that are doing well in international assessments of student achievement are not doing it because they have bonus pay schemes. They are doing it because they offer salary progression and working conditions that attract the ablest graduates – and keep them close to the classroom. \[18\] Salaries rise to more than double the starting salary in Scotland, Singapore and Taiwan – and three times in Korea \[19\]. Performance pay schemes that link teachers’ professional learning with rewards through reformed career structures are proving more durable than bonus pay schemes and are attracting increasing support \[20\].

The evidence indicates that a standards-based professional certification system \[21\] provides a sounder basis for evaluating and rewarding good teaching than competitive bonus pay schemes \[22\]. However, it needs to be recognised that establishing such a system is a complex enterprise, politically and technically - it should be regarded as at least a 10-year national endeavour. Close attention needs to be given to all the components in a standards-based professional learning system. In summary, if a standards-based certification system were working well:

- Teachers would regard the standards as challenging and worth pursuing as a guide to their professional learning.
- It would lead most teachers to seek professional learning experiences that helped them reach accomplished teaching standards and improve student learning outcomes.
- Teachers would regard the assessment methods as valid, reliable and fair
- Employing authorities would regard certification as a reliable basis for recognising accomplished teachers and providing salaries and career paths that retained the best graduates.
- It would lead teachers who could not attain the standards to consider other occupations

These are the central characteristics of a profession-run certification system. Such a system is consistent with recent OECD reports on building a high-quality teaching profession referred to earlier (e.g. OECD, 2009, 2010, 2011).

Where their education systems do not yet match the best-performing systems, they might directly adapt the methods used by Finland, Canada and the East Asian countries. They will be in a position to recruit a substantial proportion of their teachers from among the best university students in the country and offer them a lot of discretion in the way they do their jobs. They will be looking for ways to build the capacity of their systems and support their teachers. Their accountability systems will tend to the professional model, not the administrative model. Rather than regulating and directing what goes on in the school, they will focus on devising incentives and support systems that will align the interests of the school faculty with the public interest. (OECD, 2010, p. 240)

The same OECD report goes on to suggest that

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there may be a relationship between the degree to which the work of teaching has been professionalised and student performance. Indeed, the higher a country is on the world’s education league tables, the more likely that country is working constructively with its unions and treating its teachers as trusted professional partners. . . (p. 240)

A professional certification system is consistent with the idea of entrusting teachers with the responsibilities of a profession - it strengthens the role that teachers and their organisations play in:

- Standards development – in defining what the profession expects its members to get better at.
- Developing methods whereby teachers can demonstrate how they meet the standards
- Operating systems for assessing teacher performance and providing certification to teachers who meet the standards
- Developing and operating professional learning programs to help teachers meet the standards.

The following are some of the lessons that have emerged from past attempts in Australia and countries such as the USA, England, Scotland, Chile and Singapore as they have attempted to develop schemes for identifying and rewarding accomplished teachers:

1. Get the incentives right if you want most teachers to plan for and engage in long term professional learning – use professional certification linked to career progression rather than one-off bonus payments.
2. Ensure that the pathway to advanced certification is a broad pathway expected of all teachers, not just an elite few
3. Make sure the system is the responsibility of an independent, national body representative of all key stakeholders.
4. Mainstream professional certification – that is, make achieving each certification stage a condition for being eligible to apply for the next (i.e. to be eligible for Lead Teacher and School Principal positions, teachers should have gained certification as accomplished teachers.)
5. Do not confuse professional certification and local performance management.
6. Recognise that teaching is made up of many specialist field - elaborate the standards and provide certification for accomplished teachers in each field
7. Base assessment on direct evidence of what students are doing and learning as a direct result of a teacher’s teaching, rather than indirect, value-added measures from national tests.
8. Conduct the research needed to ensure the certification process meets high psychometric standards for validity and reliability before going to scale.
9. Ensure that assessors are teachers who work in the same field of teaching and are trained to high levels of reliability
10. Work hard to ensure that employers come to trust the certification as a measure of accomplished teaching and use it as the basis for higher salaries and career advancement.
11. Build a new professional learning infrastructure, within and across schools and in collaboration with universities, to support teachers preparing for certification.

It is in the interests of governments and employers to have a teaching profession that has a strong sense of ownership for its professional learning and certification system.

Performance-based Career Structure
The final section of this submission will respond to the invitation to provide further input on issues that are likely to arise in establishing a performance-based career structure for teachers, and how those issues should be handled. These include how to:

- Align career structures with the national teaching standards
- Design selection processes for promoting teachers to defined positions so that there is not an automatic progression based on accreditation (certification?) or qualifications
- Ensure that the career structure is cost-effective
- Phase in the career structure

**How to align career structures with the national teaching standards**

This question identifies a key issue that needs to be addressed if the national standards and certification processes are to lift teacher quality and the quality of teaching. Certification systems can have powerful effects on learning and performance if they gain widespread respect from members of a profession and if a strong market is created for nationally certified practitioners. At present, the nature of what the eventual relationship between the national standards and career structures will be remains unclear. It could be strong, but there is a real likelihood that it will be weak.

This relationship can be worded in different ways. For example, if it were worded - “How to align career advancement in schools and school systems with national professional certification levels” - it might help to indicate that a rigid or automatic “alignment” between the two is not to be expected or desirable. A strong relationship, yes, in the sense that employing authorities value it and use in a variety of ways to provide incentives to teachers to undergo the professional learning required, but not a one to one alignment between professional certification and designated positions in school (such as appears to be the case with NSW’s introduction of the Highly Accomplished Teacher position in some schools).

What will be necessary if the certification system is to have its intended effect is that employing authorities develop a variety of ways of giving their teachers irresistible incentives to undergo the professional learning required to gain professional certification.

The opportunity to build strong links between expertise in teaching and salary structures may be lost again as it was with past reforms such as the Advanced Skills Teacher. What will matter here is not so much the standards, as how the assessment and certification of teachers is to be conducted, and by whom. If AITSL’s role is merely to develop generic standards and each school and school system insists on conducting the assessment of applicants for certification in their own way, the relationship will be weak. The credibility of certification will vary, fail to gain respect and go down the pathway of previous reforms over the past twenty years. (The argument for a national certification is developed in a number of recent papers.23[23])

Schools and school systems have a wide variety of promotion positions built into their staffing structures and these are often built into industrial awards as well. A professional certification system could mesh in well current career structures.

There would appear to be three ways in which schools and school system could recognise national certification (or “align” career structures with national certification):

a) as the basis for a career pathway for excellent teachers who wish to continue to practice full time as classroom teachers

b) as a necessary or highly desirable qualification to be eligible for promotion positions as specialist teachers with responsibility for using their expertise to promote professional development and improved student learning in their school or across schools.


c) As a necessary condition for career pathways into school leadership and administration (research indicates that school leaders that teachers see as excellent practitioners are more likely to be effective in terms of improving student learning outcomes)

(Singapore provides an example of a country that has introduced a similar variety of career pathways to promote development to high teaching standards for all teachers\textsuperscript{24}.)

**Design selection processes for promoting teachers to defined positions so that there is not an automatic progression based on accreditation (certification?) or qualifications**

(This question seems to be similar to the previous) There is no question that decisions about promotion should remain the responsibility of employing authorities. Schools and school systems should be left to operate their own human resource and performance management systems in their own way and to suit their context. However, a central component of the National Partnership Agreement/Smarter School agreements is that employing authorities will provide effective incentives for their teachers to undertake the professional development that will eventually enable them to gain professional certification.

There was a clear “bargain” in the COAG/NEA Agreement that AITSL would “develop and implement a national assessment certification system for Highly Accomplished and Lead Teachers and that employing authorities would reward them in ways that retained then where they were needed – in our classrooms and schools” (Smarter Schools Fact Sheet, 2010). The Agreement was clearly based on the expectation that governments and employing authorities would create a strong market for nationally certified highly accomplished teachers as their part of the bargain. In theory at least, schools or school systems that did not recognise nationally certified teachers might find they were losing their best teachers to school systems that did. Australian education would thereby benefit if governments encouraged the development of a strong market for nationally certified teachers in the different employing authorities.

A clear distinction needs to be made between Human Resource management policies and procedures within particular schools and school systems and profession-wide registration/certification systems. Recent media releases from the federal Minister for Education have tended to confuse the two. These have appeared to place AITSL in an awkward, if not contradictory, position. Is its main role in the future to engage the profession in establishing a voluntary profession-wide system for providing teachers with a portable certification (as originally directed by the Minister [or Ministers?]), or is its role to provide school managers in each employing authority with procedures for operating their own performance management and annual bonus pay schemes? The latter seems a very unusual thing for a government to do for a profession.

It is important to be clear about the distinction between a professional certification system and performance management. National professional bodies run certification systems, independent of particular employing authorities. Providing a rigorous certification system, as in most professions, is the role of a national professional body, not employing authorities or state registration bodies. Unlike performance management, applying for professional certification is voluntary. Certification is portable, not specific to particular employing authorities

- Voluntary and available to all members of that profession
- Based on assessment of performance; it is not an academic qualification
- Belongs to the person; it is not a job or position specific to a school or employer.

A major aim of the NPA was that a national certification system would help to promote greater teacher mobility.

In contrast, performance management systems are right and properly the responsibility of employing authorities. Their function within the organisation is different from professional certification. Both are important, and can be complementary. In fact, as indicated above, performance management systems frequently incorporate arrangements that encourage relevant staff members to seek professional certification. However, when performance management systems are combined with competitive one-off bonus pay arrangements, negative consequences for staff morale and relationships usually follow.

The recommendation in the draft report to defer the introduction of the national bonus pay scheme will therefore meet with broad support. Judging by the Minister’s statement late last year, the original competitive conception of the scheme has now been replaced by a model based on standards, which is more likely to lead to greater productivity, providing certain conditions are satisfied. However, proposal to still pay teachers a one off bonus for certification will severely weaken its impact. Certification, by definition, is not a one off achievement. The Agreement intended it as a career stage.

A major concern that is likely to emerge with the introduction of a national certification system will be ensuring an equitable distribution of certified teachers. Schools will need to be able to compete on similar basis for such teachers. The Australian Government could/should stipulate that each school should (over time) have a defined proportion of teaching staff who are nationally certified highly accomplished and lead teachers (our BCA report recommends 30% at the highly accomplished and 20% at the lead teacher levels) – and find schools accordingly.

**Ensure that the career structure is cost-effective**

Any comparisons between the cost-effectiveness of different career structures are difficult. It is generally recognised that the current career structure for teachers is only weakly related to increasing expertise and evidence of improved effects on student learning. The ratio of salaries at the top of the scale to those for beginning teachers in Australia is one the lowest among OECD countries. International surveys indicate that few teachers think that they will be rewarded for evidence of professional learning.

Teachers salaries at the high end are unlikely to increase unless there is evidence that these increases are linked to evidence of higher teaching standards. For a standards and professional learning system to be more cost-effective than the traditional pay system, conditions such as the following would need to apply:

- Teachers would see the standards as valid, reasonable and attainable.
- All teachers would see advanced certification as something they aim for as a normal part of their career development.
- Teachers would regard the methods used to assess their professional knowledge and performance as valid, reliable and fair.
- Teachers would seek or provide themselves the kind of professional learning that helps them achieve the standards.
- The standards would provide teachers with a clear guide as what counts as expert teaching in their specialist field of teaching.
- Teachers would regard the costs of applying for certification as small in comparison with the financial rewards for gaining certification.
- Government/s would be confident that the certification process was rigorous.
- Government/s would provide financial rewards sufficient to lead most teachers to apply for certification as a normal part of their career development.
- School leaders would encourage all teachers to work toward certification as part of their professional learning and to benefit their school.
• Schools would provide teachers who gain certification with time to work “shoulder to shoulder” with small numbers of teachers around projects to improve student performance.
• Teachers who cannot attain the standards after a certain period of time may consider other occupations.

_Dealing with underperformance_

The need to deal with underperformance in the future will be reduced if the rigour of procedures for assessing teachers for registration and full entry to the profession is uniformly strengthened across states and territories.