A response to the announcement about immediate changes to the accreditation of professional learning providers in New South Wales (NSW)

For the attention of the Chief Executive Officer, New South Wales Education Standards Authority (NESA) and the Minister for Education and Early Childhood Learning

4 December 2020

Dear Mr Martin and the Hon Sarah Mitchell MLC

The Council of the Geography Teachers’ Association of New South Wales and Australian Capital Territory (GTA NSW&ACT) wishes to provide a response to recent communication about the Accreditation of Professional Development Courses Policy, and changes to Authorised Providers of professional development in NSW.

The Council would like to acknowledge the long-standing relationship of trust and support developed with representatives from the New South Wales Education Standards Authority (NESA). Such a relationship occurs in response to engagement in consultative processes and a shared understanding about the legitimacy of expertise held by GTA NSW&ACT Council.

The response is structured in the following way: context of the Association; professional learning needs for teachers of Geography; key concerns; recommendation. Our area of concern particularly focuses on Section 4 of the Accreditation of Professional Development Courses Policy.

As part of the advocacy process for both the subject of Geography and the professional learning needs of Geography teachers, the GTA NSW&ACT Council wishes to make a recommendation as part of the response. The recommendation is for the Professional Teachers’ Council of NSW (PTCNSW) to be formally acknowledged and identified in policy and practice as an Authorised Provider of professional development.

The Council of GTA NSW&ACT commend the following response to you and thank you in advance for your consideration of our position.

Best wishes,

The 2020 – 2021 Council of GTA NSW&ACT
4 December 2020

Dear Mr Martin and the Hon Sarah Mitchell MLC

The 2020 – 2021 Council of the Geography Teachers’ Association of New South Wales and Australian Capital Territory (GTA NSW&ACT) wishes to provide a response to recent communication about the Accreditation of Professional Development Courses Policy (the Policy) and changes to Authorised Providers of professional development in NSW.

The response is structured in the following way: context of the Association; professional learning needs for teachers of Geography; key concerns; recommendation. Our concern focuses on Section 4 of the Policy.

Context

The Geography Teachers Association of New South Wales and the Australian Capital Territory (GTA NSW&ACT) is a not-for-profit, incorporated body, established to represent the professional interests of Geography educators, most specifically Geography teachers in NSW and ACT. The Association is one of the seven affiliates of the peak body for geography education in schools: the Australian Geography Teachers’ Association (AGTA).

There are 646 members of GTA NSW&ACT located across regional, remote and metropolitan areas of the state and territory. Membership includes groups (school faculties or departments) and individuals (secondary Geography teachers, primary teachers, teacher education students, educational consultants, academics, and retirees). One of the responsibilities of GTA NSW&ACT is to design and deliver quality, evidence-informed professional development (PD) courses for teachers around the delivery and assessment of the K – 12 Geography syllabus. Another responsibility is to actively represent and advocate for the interests of membership, geography education, and the profession of teaching overall. Such advocacy often occurs through responding to appropriate authorities and making recommendations about educational decisions, policies and other matters deemed to be of state and national interest.

The following response represents the views of GTA NSW&ACT Council. There are twenty-one Councillors, all of whom are Geography educators. Each Councillor has taught or are currently teaching Geography in either Government, Independent or Catholic schools, or in initial teacher education programs at university, or in resource provision. The Councillors are dispersed across Sydney, Canberra, and regional centres of NSW including Wagga Wagga and Newcastle. The Council of GTA NSW&ACT considers the exclusion of the Professional Teachers’ Council of NSW (PTCNSW) as an Authorised Provider of PD courses to be a matter of interest and concern to the profession; it is also a concern those involved in the teaching of Geography. As a result, we feel compelled to respond.
**Professional learning for teachers of Geography**

In recent communication from the New South Wales Education Standards Authority (NESA) to the Professional Teachers’ Council of NSW (PTCNSW) about endorsing professional development (PD) providers and courses, there were four priority areas for PD identified:

1. Delivery and assessment of NSW Curriculum/Early Years Learning Framework (as appropriate);
2. Students/children with disability;
3. Aboriginal education and supporting Aboriginal students/children; and
4. Student/child mental health

The Association focuses on supporting quality teaching, learning and assessment practice for Geography; therefore, GTA NSW&ACT is a salient, legitimate, and highly respected leader of professional learning for the subject. The Council of GTA NSW&ACT and the academics within geography education and the broader academy of Geography are recognised as state, national and international experts in their field of pedagogical practice, content knowledge and/or research. As such, GTA NSW&ACT is best placed to design and deliver quality NESA Accredited PD courses to meet Priority Area 1 for Geography. Such placement is compromised if PTCNSW are not recognised in policy and practice as an Authorised Provider of NESA Accredited PD courses.

Being a member association of PTCNSW ensures GTA NSW&ACT is best placed to address professional development (PD) for Priority Area 1 in Geography. The PTCNSW Professional Learning Committee ensure all PD courses exceed NESA accreditation requirements. In so doing, GTA NSW&ACT Council is confident all previous and current NESA Accredited PD courses, together with those planned for the future are of best practice, high impact and clearly connect to:

1. the Australian Professional Standards for Teachers;
2. the empirically derived *Professional Standards for the Accomplished Teaching of School Geography* [https://www.agta.asn.au/files/Professional%20Standards/geogstandards.pdf](https://www.agta.asn.au/files/Professional%20Standards/geogstandards.pdf);
3. an empirical and theoretical evidence base in the fields of education and geographical education; and

From the five elements of High Impact Professional Learning, the PTCNSW NESA approved PD courses offered by GTA NSW&ACT resonate most with the third element: *Collaborative and applied professional learning [which] strengthens teaching practice.* Such an element also connects to Priority Area 1 identified in recent NESA communication. For example, our Annual and Regional Conferences and the Webinar programs provide expert academic input, focus on differentiation strategies, and provide an opportunity for collaboration to occur online and via in-person workshops. The purpose is to strengthen the geographical discipline knowledge of teachers, develop teacher efficacy and improve student learning outcomes via improved teacher practice. Furthermore, the Open Learning online programs are built around collaboration and sharing to shape and strengthen geographic knowledge and understanding, pedagogical practice and creation of authentic networks.

The innate uniqueness and strength of PD courses offered by PTCNSW and the professional associations lie in their cross-sectoral and cross-system availability and accessibility. Furthermore, such uniqueness and strength also lie in the targeted expertise connected to each professional
association. Such expertise under the PTCNSW umbrella through which applications for NESA Accredited PD typically arise relate to subject-specific areas (such as Geography) which enables clear reach into an identified Priority Area. With more than 40% of teachers who are responsible for teaching Geography in secondary schools being identified as ‘out-of-field’, it is crucial for the integrity of Geography that GTA NSW&ACT are able to provide NESA Accredited PD courses through PTCNSW as an Authorised Provider. To do so will enable reach across NSW and also across levels of confidence and experience in the teaching of Geography. Currently, we are not aware of the listed Authorised Providers having enough capacity or in-depth expertise to be able to effectively meet the diverse PD needs for teachers in Geography.

Key points of concern
The Council of GTA NSW&ACT welcome the need for a clear, rigorous, quality assurance and auditing process for accrediting professional development (PD) providers and courses. We realise the current number of current PD providers is immense and requires scrutiny. The Council also recognise the need to identify priority areas for PD courses. Additionally, the Council of GTA NSW&ACT understand and accept the intent of the recently released Accreditation of Professional Development Course Policy to review and endorse Authorised Providers of PD. What is not understood or accepted, and what is not clear from the policy and related communication, is the reason why the Professional Teachers Council of NSW (PTCNSW) is deregistered and therefore excluded from the list of Authorised Providers. The communication from NESA to PTCNSW states “The NESA Registered PD you have provided to teachers in the past has made a significant contribution to the NSW teaching profession and accreditation system”, so it raises the question as to why PTCNSW is no longer considered to be a provider. The Council of GTA NSW&ACT would like to challenge the decision to deregister PTCNSW as an Authorised Provider. In so doing, we put forward a formal request for clear and transparent communication to be issued to PTCNSW and the professional associations about why such a decision occurred. We also respectfully request a re-consideration of this decision.

Section 4.1 of the Accreditation of Professional Development Courses Policy (the Policy) states that Authorised Providers must provide evidence of the following:

1. course presenters have relevant qualifications and/or experience
2. policies and/or procedures to provide quality assurance, including continuous improvement and evaluation of courses
3. evidence of recent delivery of PD to teachers that demonstrates a positive impact on teacher practice and/or student learning
4. current, accurate and secure administrative and record management systems
5. appropriate and ethical strategies for marketing and advertising PD products and delivery of services
6. current insurance cover to conduct PD activities

It is the firm view and long-term lived experience of GTA NSW&ACT Council that PTCNSW does indeed meet the criteria from Section 4.1 of the Policy. Furthermore, it is also the understanding of GTA NSW&ACT Council, that PTCNSW via the Professional Learning Committee, consistently demonstrates the attributes associated with Section 4.1.1, Additional Requirements for Authorised Providers:

1. to have rigorous internal policies and processes for assessing PD courses;
2. to provide a copy of all relevant policies and procedures to NESA for their assessment;
3. to submit the following information to NESA about all NESA Accredited PD at least four weeks prior to delivery – course title; course description; and applicable priority area applicable to Standard Descriptors; and
4. to evaluate data for NESA Accredited PD as requested.

There are a couple of points from Section 4.1 and Section 4.1.1 of the Policy around which GTANSW&ACT Council wishes to particularly comment.

In response to Section 4.1 points 2, 3, 4 and Section 4.1.1 points 1, 2:
- It is the case that PTCNSW have a rigorous, thorough, extensively documented, and consultative process for ensuring the provision of quality NESA accredited professional development (PD) occurs across all sectors and systems. All applications are thoroughly checked by the Professional Learning Committee to ensure the rationale, content and desired outcomes connect directly to NESA Standards and a wide evidence-base including empirical research, feedback from membership, and policy directions. NESA Accreditation is valid for 12 months only even if the course extends beyond 12 months. Following this, each course longer than 12 months, offered by an Association (such as GTA NSW&ACT) must be renewed through re-application to the PTCNSW Professional Learning Committee to maintain NESA accreditation. It is the case that no PD course offered by professional associations under the PTCNSW umbrella have ever been challenged by NESA in response to quality of a priority area.
- PTCNSW as a provider of NESA Accredited PD from professional associations has knowledge of each course from application to approval to activation. PTCNSW provide a professional online user-friendly portal and interface to ensure a consistent application process for all PD courses offered by Associations. It is a requirement for all courses to include mechanism for generating feedback from which to consider future amendments. Therefore, PTCNSW provides a holistic end-to-end service to the professional associations which enables the Association to consistently lead and deliver high-quality PD to improve teacher practice and ultimately improve student learning outcomes.

In response to Section 4.1.1, point 3: It is the case that due to the incidence of NESA requiring information about all NESA Accredited PD at least four weeks prior to delivery, such a timeline is built in to the PTCNSW process for accreditation. Associations are provided with a list of dates the Professional Learning Committee will meet and all applications are due a week prior to the meeting date. Within 24 hours of the meeting occurring, the Association representative will receive detailed advice and feedback about areas of the application which either meet or exceed accreditation requirements together with those areas requiring further attention. Such a process ensures high standards are met for accreditation approval and allows for timely registration to occur for attendance at the PD course.

Quality, accredited PD is the hallmark of what is professed as being integral to the work of PTCNSW and the professional associations.
Recommendation

In addition to putting forward a formal request for clear, transparent communication to be issued to PTCNSW and the professional associations about why PTCNSW is no longer acknowledged as an Authorised Provider, the Council of GTA NSW&ACT also wishes to propose a recommendation.

The Professional Teachers’ Council of NSW (PTCNSW) via the Professional Learning Committee, do ensure all professional development (PD) courses offered by all member associations exceed the requirements of NESA accreditation. A documented history of accreditation applications, feedback-feedforward comments on such applications, application revisions where appropriate, and evidence-informed rationales for all registered PD courses is available. The purpose of such documentation is to ensure there is accountability for the provision of quality, targeted professional learning opportunities for all teachers across sectors and systems, in regional, remote and metropolitan areas of NSW.

Therefore, the Association would like to recommend the following items to the Chief Executive Officer of New South Wales Education Standards Authority (NESA) and the Minister for Education and Early Childhood Learning:

• To reverse the decision about the Professional Teachers Council of NSW (PTCNSW) not appearing on the list of Authorised Providers who can assess and accredit NESA accredited PD on NESA’s behalf; and in so doing
• To include the PTCNSW as an Authorised Provider to assess and accredit courses they deliver in the priority areas as NESA Accredited PD in the Accreditation of Professional Development Courses Policy (the Policy).

The recommendation is based on best-practice vigilance and responsibility demonstrated by representatives from PTCNSW and the Professional Learning Committee for meeting all items in Section 4 of the Policy. Such strict and retrievable documentation of adherence to each item identified in Section 4.1 and Section 4.2 of the Policy therefore ensures each PD course, historically and currently, not only exceeds all NESA accreditation requirements but also remains unchallenged by NESA.

Thank you for your consideration of our response. We would like to extend an invitation for further correspondence with the Council of GTA NSW&ACT via gta.admin@ptc.nsw.edu.au

Best wishes, 2020 – 2021 Council of GTA NSW&ACT