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# Appendix one – Response from agencies



Ms Margaret Crawford  
Auditor-General of NSW  
Level 19, Darling Park Tower 2  
201 Sussex Street  
SYDNEY NSW 2000

DGL19/585

Dear Ms Crawford

Thank you for your letter of 28 August 2019 providing a copy of the *New South Wales – General's Performance Audit – Ensuring teaching quality in NSW public schools* report and seeking a response from the Department of Education (Your ref: D191841/PA6637). I am pleased to provide you with an Education Cluster response to the report.

It is evident the audit recommendations presented in the report are clearly aligned with the strategic plans of the Department of Education and NSW Education Standards Authority (NESA).

The Department of Education Strategic Plan 2018-2022 includes the goal that every student, every teacher, every leader and every school improves every year; to enable us to achieve this goal, we have made Improving Teaching Quality one of the five key priorities for the Department.

The Department and NESA have jointly prepared a response which reflects the position of both agencies, supporting all seven (7) recommendations. The consolidated response is reflected in the table attached together with detailed commentary linked to each recommendation.

I want to take this opportunity to express my appreciation for the input you and your office have added in supporting this important body of work. Further to this, I would like to acknowledge officers from across the Education Cluster who have contributed to this activity.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Scott'.

Mark Scott AO  
**SECRETARY**  
**DEPARTMENT OF EDUCATION**

6 September 2019

## Response to Recommendations

	Recommendation	Response	Comments
1.	Work with relevant stakeholders to ensure Teacher Accreditation Authorities receive adequate training before making accreditation decisions.	Support	<p><b>Supporting Proficient Teacher accreditation decisions</b></p> <p>NESA is currently conducting research that aims to identify a minimum benchmark for Proficient Teacher. Establishment of a valid and reliable benchmark for Proficient Teacher practice will underpin strategies aimed at supporting TAAs across NSW to make consistent accreditation decisions.</p> <p>NESA will use findings from the research to</p> <ul style="list-style-type: none"> <li>Communicate a consistent definition of teaching quality at the Proficient Teacher level of the Standards</li> <li>produce resources that support the development of a common understanding of what Proficient Teacher practice looks like across the profession</li> <li>inform criteria for conducting risk-based audits of TAAs' Proficient Teacher accreditation decisions.</li> </ul> <p>Online support materials are also under development for implementation from November 2019 that provide more guidance for principals, TAAs and supervisors on making valid, reliable and consistent judgements about practice at Proficient Teacher. These resources will be updated, as necessary, based on findings from the Proficient Teacher judgements research.</p> <p>The Department of Education supports NESA's research to identify a minimum benchmark for Proficient Teacher accreditation. The Department has provided principal and supervisor nominees to NESA to participate in this research.</p> <p>The Department supports NESA's provision of training of External Assessors, TAA (AIL) personnel and MCC members. Currently, the Department has commenced training of the first cohort of 150 Directors, Educational Leadership and Principals across all six operational directorates in the nationally recognised Assessor Training Program (ATP).</p>

### Education Cluster Response – Performance Audit – Ensuring Teaching Quality in NSW Public Schools

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			<p><b>Supporting Highly Accomplished and Lead Teacher accreditation decisions</b></p> <p>NESA has developed a tailored, NSW version of AITSL's Assessor Training Program (ATP) which is currently being delivered across systems and sectors in NSW to improve cross-sectoral consistency. The training involves a comprehensive online module followed by a face-to-face training session for External Assessors, TAA (AIL) personnel and MCC members.</p> <p>Completion of the ATP online module and the face-to-face session is mandatory for all agents in the assessment and decision-making process for higher-level accreditation including:</p> <ul style="list-style-type: none"> <li>External Assessors allocated to conduct observations of applicants as part of the higher-level application and assessment process</li> <li>members of the MCC responsible for moderating judgements and providing TAAs (AIL) with advice and recommendations about accreditation</li> <li>TAA (AIL) personnel responsible for assessing applications and making decisions about accreditation at the higher levels.</li> </ul> <p>The ATP aims to improve the consistency, validity and reliability of accreditation decisions for Highly Accomplished and Lead Teacher.</p> <p>The ATP is designed to provide assessors with:</p> <ul style="list-style-type: none"> <li>a deep understanding of the Standards for Highly Accomplished and Lead Teacher</li> <li>a comprehensive understanding of national teacher certification, with particular emphasis on the role of assessors</li> <li>skills in making valid and consistent judgements about evidence of practice against the Standards for Highly Accomplished and Lead Teacher</li> <li>the capability to undertake informed observations of teaching practice</li> <li>guidance on engaging in effective communications with fellow assessors.</li> </ul>

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			<p>applicants, principals, referees and others during the assessment process.</p>
2.	<p>Review and improve the application and assessment processes for attaining higher-level accreditation, in consultation with NSW and national stakeholders, by</p> <ol style="list-style-type: none"> <li>a) clarifying the quantity and quality of evidence for higher-level accreditation</li> <li>b) reducing duplication throughout the assessment process</li> </ol>	Support	<p>NESA has been working on strategies to clarify requirements and expectations about the amount of evidence required of applicants for higher-level accreditation, reduce duplication and processing times and improve alignment between NSW and national certification processes.</p> <p>In response to the Auditor-General's recommendation, NESA will revise higher-level application requirements and the processes for moderation by the MCC in consultation with key stakeholders.</p> <p>NESA's revised application process will:</p> <ul style="list-style-type: none"> <li>• clarify and communicate evidence requirements for applicants</li> <li>• improve alignment with national certification processes</li> <li>• reduce duplication in the assessment process</li> <li>• be more developmental in nature by increasing opportunities for support and feedback to applicants throughout the process.</li> </ul> <p>The Department of Education welcomes the proposed revision and will work with NESA to ensure this supports our shared commitment to increase the number of teachers accredited as Highly Accomplished and Lead Teacher in NSW.</p>
3	<p>Implement a program of risk-based reviews to provide confidence that proficient level accreditation determinations align with the Australian Professional Standards for Teachers.</p>	Support	<p>The Department and NESA want to ensure that the public can have confidence that proficient level accreditation determinations align with the Australian Professional Standards for Teachers. The agencies will work together to ensure there is moderation of decisions made by TMs and that TAAs are actively accessing the guidance and support available to them.</p> <p>NESA's internal process for auditing Proficient Teacher and maintenance of accreditation decisions is under development. A pilot is planned to begin in late 2019 that aims to review the extent to which the revised policies for Proficient Teacher and maintenance are meeting their objectives.</p> <p>To inform NESA's longer-term Proficient Teacher audit process, a valid and reliable benchmark for Proficient Teacher practice needs to be established and agreed to by</p>

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			the profession, NESA is currently conducting research that aims to identify a minimum benchmark for Proficient Teacher.
4	<p>Improve the Performance and Development Framework by:</p> <ul style="list-style-type: none"> <li>a) providing guidance that supports aligning goals, professional development, observations and reviews to the Australian Professional Standards for Teachers</li> <li>b) strengthening the quality of observations of teaching practice and requiring at least one observation to be conducted by a supervisor</li> <li>c) providing guidance that supports supervisors and principals to effectively use the framework to improve teacher performance before formal performance management</li> <li>c) monitoring implementation of the Framework through collection of de-identified Performance and Development Plans, observations and reviews</li> </ul>	Support	<p>The Department is committed to ensuring the Performance and Development process for teachers supports the ongoing improvement of student outcomes through continuous development of a skilled, effective and professional teaching workforce. Within the Executive Priority Program for Improving Teaching Quality we are aiming to deliver in early 2020 (subject to consultation) a</p> <ul style="list-style-type: none"> <li>- Refined Performance and Development Plan (PDP) template clearly linked to the Australian Professional Standards for Teachers (the Standards) to support accreditation processes, with agreement of the NSW Teachers Federation.</li> <li>- Relaunch of the Performance and Development Framework for Principals, Executives and Teachers via a consolidated suite of e-learning tools and a face-to-face format to support and build supervisor and principal capabilities in managing performance and development.</li> </ul> <p>The revised Framework will clarify the requirement for observation and the Department will propose the requirement for at least one observation to be conducted by a supervisor, subject to consultation with relevant stakeholders. There already exist a number of templates for observation of teaching, linked to Instructional Rounds, Quality Teaching Rounds, Accreditation and Improvement programs. The development of an observation template to support the performance and development process will be explored.</p> <p>We will further consider and consult on the appropriate mechanism for monitoring of how the Framework is being applied in schools, including plans, observations and feedback to teachers, in order to support the Department in refining our guidance and targeting our professional development of teachers and supervisors.</p>
5	<p>Improve the School Excellence policy by</p> <ul style="list-style-type: none"> <li>a) clarifying the quantity and quality of evidence required for external validation</li> <li>b) requiring tailored written feedback from external validation panels, allowing</li> </ul>	Support	<p>School Planning, including self-assessment against the School Excellence Framework and the use of external validation, is an important part of ensuring every school improves every year. Refinements to this process are being implemented as part of the Executive Priority Program Improving Schools and Student Outcomes:</p> <ul style="list-style-type: none"> <li>a) Work has commenced with Directors, Educational Leadership (DELs) and CESE to build contextualised, authentic, self-assessment processes to address</li> </ul>

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	<ul style="list-style-type: none"> <li>c) aligning the external validation process to the school planning and reporting cycle to allow schools to better use the insights gained from the external validation process</li> </ul>		<p>the perceived onerous task of creating evidence sets. Further support will be developed by gathering sample evidence sets from schools undertaking external validation in 2019, to support system understanding of the quantity and quality of evidence required. The Department places a stronger focus on analysis rather than annotation when undertaking self-assessment, i.e. identifying evidence of impact/change rather than activity/process quality, and drawing conclusions and future directions based on these evidence sets.</p> <ul style="list-style-type: none"> <li>b) The external validation panel process is currently being reviewed as part of the Executive Priority Project workstream on School Excellence. This includes strengthening the external validation process to support and inform school planning.</li> <li>c) The Improving School and Student Outcomes Steering Committee has endorsed a move to a 4-year planning cycle, aligning the external validation cycle with the school planning cycle. Roll out of the new model will commence with schools undertaking external validation in 2020. The rolling school planning cycle will commence for all schools in 2021, in line with the new school planning cycle.</li> </ul>
6	Develop and implement a strategy on how to more effectively use Highly Accomplished and Lead Teachers to improve teaching quality across the state	Support	<p>There is an important role for skilled and experienced teachers to work with colleagues leading professional learning communities within and across schools. Many of our teachers already take on these additional responsibilities voluntarily or as part of a leadership role in schools, but this is ad hoc rather than systematic.</p> <p>To provide greater capacity for leadership of teaching and learning, the Department will scope and consult on options for career pathways that would recognise and reward expert teachers who remain in the classroom and work with other teachers to improve their practice. This would be parallel to the traditional school leadership pathway, with opportunities for movement between.</p> <p>Research shows, and the Department agrees, that HALTs demonstrate high levels of teaching efficacy and engage in practices that demonstrate leadership of teaching and learning. Our Mastery of Teaching program, which will support our goal of increasing the numbers of Highly Accomplished teachers state-wide, already focuses on spreading quality teaching practice and driving school improvement. The early expansion of this program is in rural, remote and regional settings where there are few or no existing HALTs.</p>

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			Consideration of school-based roles for 'expert teachers' will build upon and seek to deploy more systematically this small but growing cohort of teachers with higher levels of accreditation.
7	Evaluate the Quality Teaching, Successful Students program to determine whether it has been implemented in accordance with guidelines and is achieving its intended outcomes.	Support	<p>Principals are supported by the Schools Strategic Resourcing Unit (SSRU) to make evidence based decisions and have the flexibility to determine how best to use their Quality Teaching, Successful Student (QTSS) staffing resource allocation. Principals are required to outline the proposed use of the allocation in their school plan and report on implementation and impact.</p> <p>The SSRU is developing strategies to support schools to strategically use their allocation and to measure the impact on student learning outcomes. The impact of the initiative can be enhanced when combined with flexible funding to focus on improving the quality of teaching.</p> <p>There needs to be a strengthening of accountability around the impact of use of the QTSS allocation, particularly now it is recurrent funding. It is timely to consider what has been achieved and if the methodology that drives the allocation to schools is meeting needs of schools, including specialist settings.</p> <p>SSRU will work with CESE to initiate an evaluation of the initiative. As part of this, the Department will consider whether to introduce an additional allocation to support secondary based staff to increase teacher quality in all public schools, as QTSS is currently only available to support primary based staff.</p>