

8 May 2007

**NZEI SUBMISSION  
ON THE NEW ZEALAND TEACHERS COUNCIL  
DRAFT POLICY ON LIMITED AUTHORITY TO TEACH**

**Introduction**

1. NZEI Te Riu Roa (“NZEI”) is the professional organisation and industrial union that represents the interests and issues of its 45,000 members. Our members are employed as teachers in the early childhood and primary sectors (including kura kaupapa Maori and wharekura), support staff in the primary, intermediate, and secondary sectors, advisers employed by schools of education and universities, and special education staff employed by the Ministry of Education.
2. The main objective of NZEI is to advance the cause of education generally while upholding and maintaining the just claims of its members individually and collectively.
3. NZEI Te Riu Roa is very pleased to see that the aim of the Teachers Council is “to ensure that only appropriately qualified and registered teachers are employed in the general education system.” NZEI has a commitment through its goals that every, school, kura kaupapa Maori and early childhood education centre be fully staffed with appropriately trained, qualified and registered teachers (in teaching positions) and highly skilled support staff who are afforded ongoing opportunities for professional development.
4. This submission provides a NZEI overview on the implications of the policy for the early childhood sector, schools and kura, and comments on each section of the draft policy.

**NZEI Position**

5. NZEI:
  - a) believes that all students have the right to be taught by qualified and registered teachers
  - b) welcomes the Council’s commitment to the same goal, but notes the proposed LAT policy will undermine efforts to reach that goal
  - c) reserves the term “teacher” for only those who are qualified and registered as teachers. To use the term for those who have not completed teacher education and not applied for registration, demeans those who have undertaken professional learning, and made a commitment to the profession
  - d) opposes LATs, but acknowledges the reality of LATs as short term solution to teacher supply problems in particular situations

- e) is concerned that the use of LATs mask ongoing teacher supply issues
- f) strongly opposes the Council's development of categories for LATs
- g) strongly opposes the proposal to allow two year LATs to be issued for people in teaching positions in isolated or rural settings,
- h) suggests alternative solutions to the administrative challenges faced by professional leaders.

### **NZEI Policy on LATS**

6. NZEI's policy position is based on the firm commitment of having all students taught by registered teachers. NZEI does not support the concept of Limited Authorities to Teach (LATs). NZEI accepts LATs only as a short term measure in some specialist areas, in Kura Kaupapa Maori, and the early childhood sector, as they move to meet the requirements that all teachers are qualified and registered.
7. At Annual Meeting 2006, NZEI Te Riu Roa members endorsed the World Teachers Day statement from Education International which states "*We, the teachers of the world, insist that quality education can only be achieved with qualified teachers who have received a high level initial training, have access to adequate in-service training and have at their disposal pedagogical means to enable them to act as professionals of education.*"
8. LATs should not be easy to gain, just as teacher registration is not easy to gain. It is crucial that the Council does not bend to the pressure of small groups who are focused on expedient and immediate solutions for local settings. The Council must provide professional leadership and a broad overview of the national issues. The Council's key role is to enhance the professional status of teachers in schools and early childhood centres while still ensuring a safe and high quality learning environment.

### **Terminology**

9. A LAT is not a teacher, merely a person with an authority to carry out some teaching tasks, under the supervision of a fully registered teacher, due to the lack of availability of a registered teacher.
10. The term "teacher" must be reserved for those who are qualified and registered teachers. To use the term for those who have not completed teacher education and not applied for registration demeans those who have undertaken professional learning, and made a commitment to the teaching profession.
11. NZEI position is that the term "teacher" should be used only for those who hold registered teacher status, and not those who hold limited authority to teach.
12. A person holding a LAT should not be known as a 'specialist teacher', they are not a teacher. They may have in-depth content knowledge, but only in a narrow field. To use the term "specialist teacher" implies

they are in some way a separate group of teachers, a misperception that is reinforced by the Council favouring these positions by granting a longer LAT.

### **The Teachers Council's role in teacher shortage**

13. The Council does not have a role in teacher supply. The proposed policy, by prioritising shortages and providing longer LATs to the priorities, positions the Council as a body making decisions on teacher supply.
14. NZEI believes that the government must be continually made aware of the need for policies and resourcing to solve the issues of supply. The solution proposed by the Council, to extend the period of time for a LAT, may placate professional leaders in the short term, but masks the supply issues by reducing the imperative to solve the core issue.
15. The Council must not be masking the unavailability of registered teachers by allowing the issue to be set aside for up to three years at a time. The Council must be actively and visibly advocating for strategies to reduce such problems.
16. NZEI noted that there are figures that show that 70 to 80% of schools are currently employing staff over and above entitlement. There is huge financial benefit to a primary school to employ less highly qualified staff, and the LATs system has the potential to allow schools to employ such staff. The schools are able to create positions for 'specialists' then employ persons with the knowledge but not the pedagogy to fill these.
17. The early childhood education sector is almost invisible in this policy. Few LATs are granted in the kindergarten sector. However NZEI does not view this lack of applications as an indication of lack of need, but rather many in the sector are either unaware of, or unwilling to comply with, the need for all those employed in teaching positions in kindergartens to be registered, or to hold a LAT. An educative programme is needed to assist with compliance.
18. In kura kaupapa Maori, compliance with the requirement for compulsory registration may not yet be fully occurring. NZEI would urge the Council to allow LATs for only one year, so that any shortage of registered teachers remains visible on a constant basis. NZEI also urges close monitoring of applications for LATs for staff currently employed as kaiarahi i te reo as this has both professional and industrial implications.
19. The Council needs to undertake an educative programme about LATs with teachers and employers to ensure that some of the inappropriate uses do not occur. ERO needs to be encouraged to check to ensure that the use of LATs fits the Council's policy. NZEI views the past apparent discrepancies between the policies of ERO and the Teachers Council with regard to LATs as having been particularly unhelpful.

### **Looking to the future**

20. The roles of the members of the various groups who support teaching and learning are continually being debated at the international level at groups such as Education International, as well as nationally. While the current policy review does not need to address all of these issues, the current conversations must contain an awareness of the broader and ongoing implications.
- a) In New Zealand, debates are occurring regarding the development of a para- professional class. In England such development has impacted upon teachers work, and this highlights the importance of defining what is the role of the teacher and what is the role of the support staff personnel.
  - b) In primary schools the new initiatives around second language teaching, a move to increase social workers and other pastoral care workers in schools will mean a real interest in the definition of a teacher.
  - c) NZEI is aware that some principals are frustrated by the need to reapply annually for a LAT to fill a vacant teaching position, and can understand that this has led to requests to extend the period of time for a LAT. However NZEI does not view the proposals contained in this draft policy, to develop categories for LATs as an appropriate solution.
  - d) NZEI is concerned that the Council may be in danger of diluting the status of registration by reacting to outside pressure created by supply issues. The Council must be careful not to mask these supply issues.
21. **NZEI solutions to LATs**
- a) **Reject the Council's involvement in prioritising teacher shortage. Grant one year LATs only.**  
NZEI strongly rejects the extending of the period of a LAT beyond one year, and totally rejects the concept of categories for LATs. This includes rejection of the identification of a isolated and rural school category.  
  
NZEI urges the Council to allow LATs for up to only one year, so that any shortage of registered teachers remains visible on a constant basis.
  - b) **Advocate for Ministry of Education policy and resourcing to solve the teacher shortage**  
  
The problem needs to be clearly identified – if it is the shortage of qualified and registered teachers in some areas, then that is the responsibility of the Ministry of Education, and of the Minister. Action must be taken to ensure that this shortage is constantly and persistently made visible, with ongoing

advocacy for government policies and resourcing to address the issues.

c) **Consider the application processes**

If the problem is the procedures of the Council when granting LATS, then that needs to be addressed by the Council, but not by extending the length of the LAT.

NZEI believes that ways can be found to simplify the process of re-application. This would address the concerns of professional leaders about the bureaucracy of the processes while still ensuring that LATs are granted for one year only. Applications, and reapplications, must occur annually.

The professional leaders may be driven by the pragmatic issues of day-to-day employment, and the administrative challenges of applications. The Council must be resistant to lobbying that may attempt to solve an administrative problem by hiding the supply problem. Granting a LAT for a longer time hides the shortages.

d) **Collect data on shortages**

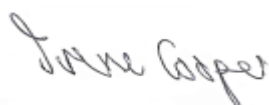
NZEI strongly recommends that the Council uses the information already sought in Form TC4 and begins to collect and collate data about reapplications for LATs by person, and by position in a school or kindergarten. Such longitudinal data would be of assistance in defining teacher shortage.

e) **Avoid expedient and casual use of LATS**

LATs should not be granted to day-to-day relievers. Such LATs may be open to misuse. The Teachers Council must promote the “20 half-day provision” as an alternative option for schools and kindergartens unable to employ registered teachers in short-term relief positions. NZEI notes that the process for application for extensions to the twenty half-days period are not onerous.

f) **Promote vigorously the status of a qualified and registered teaching force as central to quality public education.**

Professional leaders must be made aware that, in the interests of the profession, LATs, like registration, should not be easy to attain.



Irene Cooper  
**NATIONAL PRESIDENT**  
**TE MANUKURA**