The Recognition of Teacher Qualifications and Professional Registration Status across Commonwealth Member States

Balancing the rights of teachers to migrate internationally against the need to protect the integrity of national education systems
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PILOT STUDY INCLUDING:
Australia, Canada, England, India, Jamaica, Mauritius, Northern Ireland, South Africa and Sri Lanka

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- Enhance the quality of education and training;
- Accelerate the redress of past unfair discrimination in education, training and employment opportunities; and thereby
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3

1.1 Aim of this research

Teacher loss has become a major concern in many countries across the world. The increasing international migration of skilled professional teachers is aggravating this situation, particularly for smaller countries trying to maintain national schooling systems, and striving to reach the goals of Universal Primary Education by 2015. At the same time it is acknowledged that international teacher migration can benefit schooling systems and prove to a significant contributor to the professional development of teachers.

In September 2004 the Ministers of Education of the Commonwealth countries formally adopted a Commonwealth Teacher Recruitment Protocol. The Protocol “aims to balance the rights of teachers to migrate internationally against the need to protect the integrity of national education systems” (Commonwealth Secretariat, 2004: 7). The Education Ministers requested the Commonwealth Secretariat to establish two working groups, namely one on teacher qualifications, the other on teacher professional development and exchanges in order to investigate various dimensions of teacher migrations across Commonwealth countries.

A number of projects have been set up, and the research being reported in this document on the recognition of teacher qualifications and teacher professional status is one of these. In 2005 the South African Qualifications Authority (SAQA) was approached by the Commonwealth Secretariat to use its experience in qualifications framework development in South Africa and the region to lead and coordinate the first phase of the research, including:

- Investigating the extent to which teacher qualifications are recognised and transferable across Commonwealth Member States.
- Investigating the extent to which the teacher professional registration is recognised and transferable across Commonwealth Member States.
- Making recommendations on systems and criteria for the assessment of teacher qualifications and teacher professional registration to further the purpose of the Protocol, particularly to “…promote the positive benefits which international teacher migration can bring and to facilitate the sharing of the common wealth of human resources that reside within the Commonwealth” (Commonwealth Secretariat, 2004:7).

The research was initiated in January 2006 and included a survey of nine Commonwealth countries: Mauritius–South Africa–Australia, Sri Lanka–India–England, and Jamaica–Canada–Northern Ireland. Data gathering was facilitated through, (1) a review of related literature, (2) interaction with relevant bodies (mainly ministries of education, teacher professional bodies and institutes for the evaluation of foreign qualifications) and (3) identified individuals in the Commonwealth Member States. The interaction with relevant bodies and individuals was structured through the use of a questionnaire (see Appendix 1). A consultative workshop was also held in London on 17 May 2006.

At the outset of this report it must be noted that the data gathered through the survey of the nine countries was limited and difficult to verify within the constraints of a project of limited scope such as this. Despite this limitation considerable effort went into strengthening the research through relevant literature, as the reader of the report will find.

In brief, the main aim of this research project has been to:

Investigate the recognition and transferability of teacher qualifications and professional registration status across Commonwealth countries, with a view to developing systems and criteria to assess the equivalence of such qualifications and professional status across the Commonwealth to advance the purpose of the Protocol for the Recruitment of Commonwealth Teachers.

The findings of the research will be reported to the Working Group on Teacher Qualifications at their meeting in Pretoria, South Africa in September 2006. Possible recommendations for consideration by the Working Group on Teacher Qualifications are proposed; however, the Working Group Meeting in September 2006 will determine which specific recommendations go forward for consideration by education ministers at the 16th Conference of Commonwealth Education Ministers (CCEM) being held in Cape Town in December 2006.
1.2 Structure of the report

In line with the aim of the research as discussed in the previous section, this report is structured as follows:

Section 1: Introduction and background – this includes a list of definitions used, an overview of current debates on teacher and international migration, and some discussion on why there is a need for improved coordination of qualifications in the Commonwealth.

Section 2: The role of qualifications frameworks in the harmonisation of teacher qualifications – starting with an introduction to national qualifications frameworks (NQFs) as a global phenomenon, this section provides a reasonably detailed account of the strengths and weaknesses of qualifications frameworks. Recommendations for the coordination of the recognition and transferability of teacher qualifications through qualifications frameworks are also included.

Section 3: The role of professional registration in the benchmarking of teacher professional status – in this section the different aspects that make up the professional status of a teacher are discussed, including qualifications, registration with a professional body/council and continuing professional development (CPD). Recommendations for the recognition and transferability of teacher professional status are made.

Section 4: Countries surveyed – here the recommendations made in the previous three sections (teacher qualifications, professional status and employment status) are applied to the country data collected in the pilot study that included nine Commonwealth countries. Keeping in mind that the study was limited to only nine countries, and that the data collection could have been more extensive if more time and resources were available, an attempt is made to illustrate how the recognition and transferability of teacher qualifications and professional status can be facilitated. An important point in this regard is that the data collected from the nine countries was used only in part to develop the recommendations, as greater emphasis was placed on current best practice and relevant literature. The main use of the collected data was rather to illustrate the application of the developed recommendations.

Section 5: Concluding comments – in the final section we present a summary of the recommendations made in the report in a format that distinguishes between aspects most applicable to Teacher Qualifications as against Teacher Professional Registration.

1.3 Key principles that underpin the report

The following principles, based on a review of relevant literature and international best practice, are used as a basis for the recommendations that are made in this report:

1. The migration of highly skilled workers, including teachers, is a global phenomenon that is unlikely to slow down in the near future and that needs to be managed to maximise its benefits and minimise its costs.
2. National and regional qualifications frameworks improve the recognition and transferability of teacher qualifications, and therefore also facilitate migration.
3. Comparability of qualifications and equivalence of qualifications are different processes, conducted by different agencies, and for different purposes.
4. International comparability of qualifications is a viable and effective way in which the recognition and transferability of teacher qualifications can be improved.
5. Professional registration of teachers offers an avenue through which teachers’ professional status can be internationally benchmarked, which, in turn, leads to improved recognition and transferability of teacher professional registration status.
6. Professional registration of teachers can control teacher migration for the benefit of both the individual teacher and the receiving country.
7. Employment status of a teacher is dependent on both (a) the recognition and transferability of qualifications, and (b) professional status.
8. The employment status of a teacher in a country other than his/her own should be similar to the employment status in his/her own country.

9. It is important to balance (a) the rights of teachers to migrate internationally, as facilitated by national and regional qualifications frameworks, against (b) the need to protect the integrity of national education systems, as enabled by employing effective professional registration systems.

The diagram below illustrates the “balance” needed between the key principles listed above, as well as the links between each.

![Diagram 1: Balancing the rights of teachers to migrate internationally against the need to protect the integrity of national education systems](image)

### 1.4 Definitions

One of the well-known difficulties in any cross-country comparisons of education systems and qualifications is variation in the use of some of the key terminologies. For the purposes of this research project, and thus also in the formulation of the questions for the questionnaire used to gather data from the nine countries, the following definitions were used:

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authority</td>
<td>The awarding body, qualifications authority, qualifications agency, professional body, professional council or government department that officially authorises a qualification and/or professional status of a teacher.</td>
</tr>
<tr>
<td>Benchmarking of professional registration status</td>
<td>A process through which teacher professional bodies and councils align their standards for teacher education and professional practice against accepted standards for effective and committed teaching.</td>
</tr>
<tr>
<td>Bilateral agreement</td>
<td>An agreement between two countries on the recognition of teacher qualifications and/or professional registration.</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Comparability of qualifications</td>
<td>The extent to which qualifications are found to be comparable based on an analysis of their specifications.</td>
</tr>
<tr>
<td>Continuing Professional Development</td>
<td>Any teacher education or training beyond the initial teacher qualification. It includes the whole range of learning programmes from formal programmes leading to additional qualifications to short, targeted courses for special purposes.</td>
</tr>
<tr>
<td>Equivalency of qualifications</td>
<td>The extent to which qualifications are recognised towards another qualification within or outside the country of origin based on an in-depth analysis of their specifications.</td>
</tr>
<tr>
<td>Harmonisation of qualifications</td>
<td>A continuous process of improving the coordination of qualifications in a particular community of practice, sector, country, grouping of countries or region to promote the movement of labourers.</td>
</tr>
<tr>
<td>Initial teacher education</td>
<td>This refers to what is sometimes referred to as “pre-service training”; and it is to be contrasted with Continuing Professional Development, sometimes referred to as “in-service training”. One kind of initial teacher qualification is the basic minimum qualification required by a person for recognition for employment as a teacher in a public school.</td>
</tr>
<tr>
<td>Professional status</td>
<td>A standing, conferred by an appropriate professional council or body, which indicates that an individual has the right to practise as a teacher in a public school.</td>
</tr>
<tr>
<td>Professional council</td>
<td>A body governed by statute appointed to represent teachers that devises, informs, monitors and continually updates the benchmarked standards of competence, both academic and practical, required in the practice of the profession of teaching.</td>
</tr>
<tr>
<td>Professional registration</td>
<td>Registration or affiliation with a professional council or body that enables an individual the right to practise as a teacher on a particular level and in a particular country.</td>
</tr>
<tr>
<td>Public school</td>
<td>A state primary or secondary school – to be contrasted with “private” or “independent” schools.</td>
</tr>
<tr>
<td>Qualification</td>
<td>A certificate of achievement or competence specifying awarding body, qualification type and title which makes a learner eligible for consideration for entry, advancement or progression in an academic, vocational or professional context.</td>
</tr>
<tr>
<td>Qualifications framework</td>
<td>A framework in terms of which a variety of qualifications are mapped, across institutions or providers, for the purposes of aligning them with each other. Some countries have developed National Qualifications Frameworks, and in some cases Regional Qualifications Frameworks (across a number of countries) are being developed.</td>
</tr>
<tr>
<td>Recognition</td>
<td>A process leading to the decision to accept and formally acknowledge a foreign qualification based on either a determination of the comparability of the qualification, and/or the equivalence of such qualification (preferably both) for access related to educational and/or employment opportunities in the receiving country.</td>
</tr>
<tr>
<td>Recruited teacher</td>
<td>A teacher who is recruited for service as a teacher in a country other than his/her home country.</td>
</tr>
<tr>
<td>Recruiting country</td>
<td>A country that is seeking to recruit, or succeeds in re-recruiting, teachers from other countries.</td>
</tr>
<tr>
<td>-------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Source country</td>
<td>A country from which teachers are recruited for service as teachers abroad.</td>
</tr>
<tr>
<td>Teacher</td>
<td>A classroom teacher – rather than an administrator, school principal, etc. It does not include “teacher aides” or ancillary teachers.</td>
</tr>
<tr>
<td>Teacher migration</td>
<td>The free movement exercised by the teacher, as their human right, to seek employment as a teacher in another country, whether in response to an organised, targeted recruitment campaign initiated by a recruiting country or through individual choice.</td>
</tr>
<tr>
<td>Teacher qualifications</td>
<td>Formal qualifications as a teacher (degrees, diplomas or certificates) recognised for employment as a teacher in a public school in the country of origin.</td>
</tr>
</tbody>
</table>

Four of these definitions, namely Public School, Teacher, Recruited Teacher and Recruiting Country require initial additional comments.

National schooling systems include a range of different kinds of schools, and in the light of the key issue of the “equivalence of employment” the researchers felt that it was important to limit the investigation to employment in public schools – as defined above. To try to take account of teachers employed by private schools, and the recognition of their qualifications in that context, would have complicated the research.

For the same kinds of reasons it was felt to be important to specify that the focus of the research be exclusively on teachers, as defined above. Again, to try to include other kinds of employees of schooling systems would have led to unfruitful complications. The issue of teacher aides or ancillary teachers emerged, during the investigation, as a key consideration. This is a matter that will be discussed in Section 3 of this report.

The use of the words “recruited” and “recruiting” in the definitions above reflects the concerns of Commonwealth Member States – concerns that were clearly articulated in the Savannah Accord agreed to by the Ministers of Education of the Commonwealth Caribbean in July 2002. Their immediate concern was teacher loss from their education systems owing to the activities of agencies recruiting qualified teachers for employment in other countries. But it is clear that there are other forms of “teacher loss”; not all teachers who leave a national schooling system have been deliberately recruited for employment as teachers in other countries.

Having clarified the aim of this research project and the definitions employed, the remainder of this first section presents the contextual framework wherein the issue of the recognition and transferability of schoolteacher qualifications and professional registration status across Commonwealth countries are investigated.

### 1.5 Teaching at Risk

In September 2003 the Commonwealth Secretariat published a research document that provided the background for the development of the Protocol. This report, called Teaching at Risk: Teacher Mobility and Loss in Commonwealth Member States, is a contribution to “the international understanding of the teaching profession and the global challenge of teacher loss” (Commonwealth Secretariat, 2003b:5). The Report makes the pertinent observation that “Teacher loss is a global phenomenon which is impacting on both industrial and developing nations in the Commonwealth” (ibid.).
This document shows how teacher loss and teacher mobility are linked to each other and are aspects of increasing international migration. It proposes that there are five main forms of teacher loss (formulated slightly differently in the Executive Summary and the Introduction):

- Teacher recruitment/loss to industrialised nations/developed countries.
- Teacher recruitment to developing (often neighbouring) countries.
- Teachers ‘drifting’ to other countries where they go to obtain qualifications and may decide to stay.
- Career change associated with teacher disaffection.
- Teacher attrition, due to retirement or death (sometimes related to HIV/AIDS).

These categories of teacher loss reflect the particular concerns of Commonwealth member states about teacher loss due to (aggressive) recruiting for employment in other countries. There is a question, however, about the extent to which these might limit our understanding of teacher loss, and thus about measures that might be taken to address it.

Usually the flow of teachers out of schooling systems is referred to generically as “teacher attrition”, and the percentage of teacher attrition is one of the key pieces of information required for good supply and demand planning. Questions such as those about the reasons for teachers leaving the system and what their destinations are, are important for other purposes – for example, to consider ways to retain teachers in the system.

1.6 Consultation on the Recruitment and Migration of the Highly Skilled

In January 2005 there was a Commonwealth consultation in London. A record of this consultation was published by the Commonwealth Secretariat: Report of a Consultation on the Recruitment and Migration of the Highly Skilled (Nurses and Teachers). This Report is of considerable interest to the issue of the cross-country recognition of teacher qualifications and the employment status of recruited teachers.

A significant observation emphasised in this report is the increasing complexity of international migration, and the variety of manners in which teachers may be “recruited” for teaching in a country other than the one in which they obtained their qualifications:

International migration is an extremely complex issue, and a variety of push and pull factors were discussed during the consultation. A distinction should be made among planned recruitment, voluntary recruitment and managed recruitment. The migration of teachers and nurses extends well beyond the ministries of education and health and into the realms of finance, labour, economics and international trade (Commonwealth Secretariat, 2005:3).

1.7 The increase in the international migration of skilled professionals

Migration and development was a strong theme in the 1966 United Nations Report:

Mounting evidence indicates that international migration is usually positive both for countries of origin and of destination (ILO & UNESCO, 1966:54).

Today, forty years later, the emphasis is still the same:

The present report suggests many ways in which Governments and others could shape the nature of international migration and the distribution of its costs and benefits, thereby making migration work better for everyone. From promoting entrepreneurship among migrants, to facilitating access to financial institutions, to establishing partnerships to train health and education personnel, there is no dearth of possibilities. But such a report cannot be exhaustive. I expect that Governments will bring even more ideas to share with one another when they meet for the High-level Dialogue in September (United Nations, 2006:9).
On 18 May 2006 the United Nations General Assembly was presented with the Report: *International Migration and Development*. This Report is highly relevant to the issue of the international migration of teachers and the cross-country recognition of their qualifications. The Report shows that the migration of teachers, both in the Commonwealth and more broadly, is not an isolated phenomenon but that it needs to be understood in the wider context of increasing international migration, and particularly the migration of high skill professionals.

As its title indicates, one main thrust of the Report is to emphasise the relationship between international migration and development, and to propose ways in which this relationship can be managed to maximise the benefit to migrants, and countries of origin and destination:

*The report discusses the various ways in which international migration can contribute to co-development and presents a comprehensive review of the multidimensional aspects of international migration, including: migration trends; the impact of international migration on countries of destination and countries of origin; rights, gender, integration, benefits and the protection of migrants; and, lastly, a discussion of the international normative framework and modes of intergovernmental cooperation that have been developed to improve the governance of migration (United Nations, 2006:1).*

The Report notes that international migration is not a new phenomenon, but that its prevalence has fluctuated over history, and that towards the end of the twentieth century there was a resurgence of migration ushering in a “new era of mobility”.

*Today, globalisation, together with advances in communications and transportation, has greatly increased the number of people who have the desire and the capacity to move to other places (United Nations, 2006:5).*

This Report is “an early road map for this new era of mobility” (United Nations, 2006:5) and it provides the background for a High-level Dialogue on International Migration and Development due to take place on 14 and 15 September 2006. Many “States understand that international migration cannot be handled unilaterally. Consequently, country partnerships and bilateral agreements on migration are multiplying” (United Nations, 2006:9), and “the high-level dialogue will succeed to the extent that it ushers in an era of sustained consideration of international migration issues at the United Nations” (United Nations, 2006:10).

One characteristic of the “new era of mobility” is that it includes a greater proportion than previously of high skill professionals – including, particularly, health workers and teachers – and the UN Report notes that (a) “international migrants are usually drawn from middle-income households” (United Nations, 2006:13):

- Migrants with tertiary education constituted just under half of the increase in the number of migrants aged 25 or over in OECD countries during the 1990s. Nearly 6 out of every 10 migrants living in OECD countries in 2000 came from developing countries (United Nations, 2006:12),
- Skilled migration has been rising in recent decades, facilitated by policies that favour the admission of persons with needed expertise (United Nations, 2006:56).

This was an issue already noted as a key issue at the Commonwealth Consultation of January 2005:

*The migration of highly skilled workers from poorer to richer countries is not a new phenomenon, nor is intraregional migration. However the phenomenon is growing in importance as teacher shortages in general are affecting more OECD countries, whilst in poorer countries, human resource depletion creates an even greater challenge in meeting EFA goals (Commonwealth Secretariat, 2005:3).*

During the Consultation Dr Stillwell (WHO) noted, “The global figures on migration reflect mostly highly skilled people now, partly because communication, travel, and Internet job searches are all easier” (Commonwealth Secretariat, 2005:10), an observation that has recently been confirmed:

*Global statistics on levels and trends of highly skilled migration do not yet exist. Data from censuses has, however, permitted the estimation of the number of foreign-born persons living in OECD countries who report having completed tertiary education. Equating such persons with the highly skilled provides some indication*
of the extent of skilled migration today. In 2000, there were about 20 million highly skilled migrants aged 25 or over living in OECD countries, up from 12 million in 1990. The 8 million increase represents 46 per cent of the total growth in migrants aged 25 or over from 1990 to 2000 (United Nations, 2006:58).

The United Nations Report contends that the increasing flow of international migrants is driven by the ways in which labour markets have become globalised under the impact, in part, of developments in communication systems and travel. And the flow of migrants – which characterises the contemporary world – is unlikely to slow down in the near future; it is a phenomenon with which we are going to have to learn to live. What we need to do is to manage it to maximise its benefits and minimise its costs.

After a discussion of the dilemmas faced by both countries of origin and countries of destination, the Report says that “The growing importance of migration makes it imperative that States find workable solutions to these dilemmas ...(T)he structural need for migrant labour is not likely to disappear in a few years ...” (United Nations, 2006:71).

This is a view that strongly echoes some of the discussions reported in the various documents issued by the Commonwealth Secretariat over the past few years. Apart from the important issue of the rights of teachers to migrate to other countries if they choose to, these documents acknowledge that the international migration of teachers is likely to continue, and that the appropriate response is not Canute-like to try to stop it, but to learn how to manage it, not only for the benefit of migrants and their professional development, but also to enhance the quality of education in both source and recruiting countries. The United Nations Report indicates that:

Ultimately, laws and regulations that go against the forces of demand and supply will likely be ineffective in controlling the labour market (2006:71).

The costs to source countries of the international migration of teachers, has been high on the agenda of discussions in the Commonwealth over the past few years. Source countries suffer depletion of the key resource they need in order to achieve the goals of Universal Primary Education by 2015; there is a net loss in the public costs of training teachers, and supply and demand planning becomes much more difficult. However, the (possible) benefits of international migration to individual migrants and to the recruiting countries have not gone unnoticed:

The advantages that migration brings, both to migrants and to the societies they join, are not as well understood as they should be. Migration stirs passionate debate. It can deprive countries of its best and brightest, and it can divide families. For all the good it can bring, it can also generate social tensions; for example, issues relating to migrant integration are the focus of intense controversy. Sometimes criminals and terrorists exploit the flow of peoples. Nevertheless, the answers to many of the problems raised by migration may be found through constructive engagement and debate. This will lead to a broader recognition of the enormous benefits and opportunities that migration provides (United Nations, 2006:5).

The United Nations Report contends that the advantages of migration are not as well understood as they should be, and provides a strong argument that “We now understand better than ever before, that migration is not a zero-sum game. In the best cases, it benefits the receiving country, the country of origin and migrants themselves” (United Nations, 2006:8), and adds that “Mounting evidence indicates that international migration is usually positive both for countries of origin and of destination” (United Nations, 2006:13).

One benefit to countries of origin (source countries) prominently discussed in the United Nations Report is remittances, “ ... the funds migrants send back to developing countries, at least $167 billion in 2005 alone, now dwarf all forms of international aid combined” (United Nations, 2006:6). The Report recommends various financial arrangements to maximise the benefits of such remittances to the country of origin.

But overall, according the United Nations Report, the main benefit of international migration is the way it is – and has typically been over the past centuries – strongly linked with development “ ... international migration is a normal but crucial element in the development process” (United Nations, 2006:11).
Finally, according to the UN Report, one important catalyst in reinforcing the link between international migration and development is the cross-country recognition of qualifications, so that migrants can gain employment in the destination country at a level commensurate with their skills. This is for the benefit of the destination country as much as for the migrant himself or herself (United Nations, 2006:15):

**When skilled migrants are compelled to work at jobs that are not commensurate with their qualifications, their capacity to contribute is compromised.**

And also:

Recent analyses of the effect of skilled migration conclude that it is beneficial for receiving countries, and, generally, for the migrants themselves. However, skilled migrants are not always able to make full use of their qualification abroad... to prevent such wastage, international cooperation is needed to promote mutual recognition of degrees, qualifications and certificates. Governments also need to prevent discriminatory hiring based on origin (United Nations, 2006:61).

### 1.8 Teacher demand and supply

Teacher demand and supply is traditionally understood as an issue for each country to handle in its own terms – although in some cases it is the responsibility of sub-national education jurisdictions (such as provinces). But with the increase in international migration, and in transnational educational provision (especially in higher education) there are signs that both teacher demand and supply are breaching national boundaries – teacher demand and supply is becoming an international issue.

To the extent that this is so, it challenges countries with increasing difficulties about human resources planning for their education systems. In some respects, human resources planning for education systems has been forced to become less unilateral than it has traditionally been. The activities in the Commonwealth focused on the migration of teachers, as does this project on issues of the cross-country recognition of teacher qualifications and professional registration – all examples of this development.

It is widely reported that teacher “shortages” are becoming more prevalent in many countries around the world, as much in industrialised as developing countries. At the Commonwealth Consultation in January 2005, Mr van der Schaaf of Education International gave a presentation in which he outlined the increasing shortage of teachers across many countries (Commonwealth Secretariat, 2005:7):

Mr van der Schaaf first reviewed some of the facts around the problem of migration in the education workforce. In industrialised countries, the demographic developments have created a situation where those who are employed in the education system can stay in the system and cater for almost all the needs that are there. There is 100% literacy and little influx of young teachers. Between 25–40% of teachers are over 50 years of age and will retire within the next ten years. Although there is good demographic data in industrialised countries, they still have not been able to prevent the shortage of qualified teachers to address the issue properly.

Developing countries also face a shortage of teachers. But, the demographic development goes in another direction. There is rapid population growth and they have to meet the challenges of Education For All. In many countries, the literacy rate is 60–80%, and as low as 30% in some French speaking African countries. Achieving 100% literacy by 2015 is a double challenge, with or without adequate planning. Often, developing countries have an unpredictable environment and lack the financial means. The industrialised countries have the means, but have planned poorly, are now buying human resources from overseas. They are assisted by the increasingly internationalised labour market.
Mr van der Schaaf posed the question: is this only a North-South issue? He then provided several examples to illustrate that this is a global issue. South Africa recruits from Zimbabwe. Botswana recruits from Zambia and Guyana. Teachers are migrating within the Caribbean. Ethiopia recruits dozens of teachers from India to cater for the needs in the higher education sector. But, at the end of the line, it is always the lowest income country that pays the education bill.

In the UK, there are about 100 private agencies involved in recruiting teachers from overseas. A recently published OECD report states that about 10,000 overseas teachers recruited to teach in 2000. In the US, the numbers are not as clear, but are assumed to be 10–20,000.

As teacher shortages become more widespread, the job market for teachers extends beyond the boundaries of their home countries and this might be seen as the internationalisation of teacher demand. We can add that English – widely the language of the Commonwealth – is a valuable passport to international mobility for teachers.

A significant factor contributing to teacher shortages is the age profile of the current teacher stock. Many countries have reported that the expected number of retirements out of the teaching force over the next decade will seriously aggravate the shortage of teachers.

The Commonwealth document, Teaching at Risk (Commonwealth Secretariat, 2003b:17–21), reports as follows:

**Australia:** There is great concern about the retirement of teachers. Today the average age of an Australian teacher is 43 and it is projected that the nation faces a potential loss of 30,000 teachers in the next decade.

**Canada:** Similar to Australia, Canada is particularly concerned about the demographics of the ‘baby boom’ generation and the retirement of teachers. For example, Ontario anticipates that it will need 3,000 secondary school mathematics and science teachers in the next ten years to replace those expected to retire. It expects to hire 9,000 – 10,000 teachers per year for the next seven years.

**Jamaica:** The majority of teachers are over 30, and 46.5% are over 40 years of age, indicating that the issue of retirement will become a concern in the very near future.

**England:** As of 22 May 2002, there were 4,480 vacancies for nursery, primary secondary and special schools in England. Conservative estimates state a shortage of 2,500 teachers for London schools, and possibly up to 40,000 nationally. It is anticipated that there will be a shortage of teachers with experience in the UK since 60 per cent of current teachers are over 40. The current rate of retirement and premature retirement in the UK is 6,100 per year, which is expected to rise to over 14,000 per year within five years.

And the same document sums up the situation as follows: “The mass retirement of experienced teachers, primarily in Canada, Australia and the US, is fuelling demand for teacher recruitment” (Commonwealth Secretariat, 2003b:29).

Normally one could expect that attrition due to retirement could be replaced by the supply of newly qualified teachers, but many countries appear to be experiencing difficulties about attracting sufficient new entrants for the profession to meet the looming shortages. And retaining qualified teachers in the system is a widespread problem. Education International reports that “In the US about 20% give up teaching after three years, and 50% drop out after five years. The same is true in the UK” (Commonwealth Secretariat, 2005:7). It would be interesting to know the average “shelf-life” of newly qualified teachers across all Commonwealth countries.

But if attrition from the system cannot be met either by attracting and training new entrants or retaining a sufficient number of qualified teachers in the system, countries turn to recruiting teachers from other countries. Reports indicate that it is not only industrialised countries that resort to this way of sustaining their schooling systems:

Today, in most countries, there is a shortage of teachers. Recruitment, however, is now being done in a more organised way by governments, targeting more experienced teachers with special skills in return for ‘better’ compensation. Teachers from Guyana are going to Botswana and the Bahamas where remuneration is more lucrative. Teachers from India are moving to the United States, Canada and the UK. Recruitment agencies have identified ‘education’ as a high-growth area in the recruitment business (Commonwealth Secretariat, 2003b:11).
In the face of growing teacher shortages, more developed countries have increasingly turned to recruiting trained teachers from less-developed countries. Governments have even set up special agencies to recruit teachers from abroad (NASUWT, 2005). According to Education International, there are some 100 private agencies in the United Kingdom which recruit teachers from Barbados, Guyana, Jamaica and Trinidad and Tobago, for example (STPD, 2005). A recent OECD report stated that about 10,000 overseas teachers were recruited in 2000 (OECD, 2005). The migration of skilled workers from poor to richer countries is not a new phenomenon, and remittances from abroad play an important role in many national economies. They can even help to support national education services. However, governments have voiced concern about this loss of well-qualified professionals, which impacts on the functioning of public services, especially in small states. Planned recruitment from South to North can be seen to contradict, in some ways, the goals of Education for All. Mobility does not just occur between poor and rich countries, but across neighbouring countries as well. Private agencies recruit teachers from Canada for schools in the United States and likewise South Africa recruits from Zimbabwe, to name but a few examples. This has led to the passage of The Protocol for the Recruitment of Commonwealth Teachers, adopted in 2004 by Ministers of Education from Commonwealth countries. It presents a ‘code of conduct’, which outlines the rights and responsibilities of recruiting and source countries, as well as recruited teachers. While recognising the benefits of well-managed teacher exchanges, it stresses that recruitment can also harm a national education system by taking away its best asset: trained teachers (UNESCO, 2006:26).

The current international migration of teachers is already a sign of the internationalisation of the supply of teachers.

In India Together (www.indiatogether.org) an article called “Disturbing teacher migration tremors – December 2003” discusses the “swelling migration” of Indian teachers, particularly to Australia, New Zealand, the United States and Britain “powered by an acute shortage of teachers” in those countries. After lamenting the fact that it tends to be the better teachers who are likely to emigrate, the article makes a striking comment that “the outward-bound diaspora of Indian teachers reflects the fundamental transformation of the global labour market in recent years.” And it offers the thought that if the World Trade Organisation frees up cross border trade in services, “India may become the world’s largest supplier of trained school teachers for developed countries.”

But there is another dimension to international teacher supply – the “rapid expansion of transnational education”:

Countries facing unmet demands for skilled workers can either train them or permit them to come from abroad. Today, the training of skilled personnel has been globalised and even developing countries are active in attracting high-quality training institutions both to educate their citizens and attract bright students from abroad. The rapid expansion of transnational education indicates that the market for quality education is large and growing. Governments would do well to consider how best to collaborate among themselves and with the private sector in improving access to tertiary education and other specialised training for citizens of poor countries, especially in occupations that are in high demand in countries of destination and scarce in countries of origin. Governments might also develop joint ventures that help retain professional and technical
personnel in the countries and regions where it is most needed. Partnerships involving the private sector, both with respect to training and in improving the working conditions in particular occupations, could promote useful synergies (United Nations, 2006:56).

Some universities have established branch campuses in other countries, and many universities recruit foreign students. Some UK Universities have a strong presence in other Anglophone countries; Australian Universities have been active in South East Asia over the last decades; and three examples from South Africa might also illustrate this trend.

The University of the Western Cape was approached by the Government of Eritrea to train two cohorts of mature teachers, selected by the Eritrean authorities, as lecturers for a College of Education to be established in Eritrea. The University of Port Elizabeth offered its semi-distance Masters programme in Curriculum to students in Zimbabwe. Rhodes University offers its Masters programme in Educational Management in Namibia. The UN Report welcomes such developments as a way of managing the potential downsides of the burgeoning international migration of skilled professionals, and the depletion of the human resources of countries of origin:

Regional or even global arrangements for the training of personnel critical to the provision of basic services, such as education and health, may be an efficient response to the shortages of skilled personnel in the poorest countries. Partnerships among Governments or involving public and private institutions can play a key role in providing the required training. More broadly, in a world characterised by high mobility of skilled labour, human capital formation should be increasingly seen as an international and not only a national policy concern (United Nations, 2006:19).

And, as if commenting on the three South African examples above, it adds that:

Regional arrangements for the training of personnel critical to the provision of basic services, such as education and health, may be developed with the support of donor Governments and through public-private or private-private partnerships (United Nations, 2006:62).

We can take note of the growth of sophisticated distance education and the activities of the Commonwealth of Learning as another demonstration of the internationalisation of teacher supply. Its Director, Sir John Daniel, was a participant in the 15CCEM Mid-Term review Meeting (July 2005). In his opening remarks he pointed out that the COL was established on the basis of two ideas: “If the students can’t move to the course, let’s move the course to the students”, and the belief that “countries could benefit by harnessing technology to education and training at all levels” (Commonwealth Secretariat, 2005b:3). He proceeded to comment that the:

COL is helping the huge task of training and retraining primary teachers, as achieving the MDG for primary education will send a tidal wave of children towards school. New approaches will be needed, which is why COL is helping open schools to improve and expand. … We should value your advice on where to put our energies in the next three years and I hope that you, as education ministers, will support our work (Commonwealth Secretariat, 2005b:3).

Part of Daniel’s presentation at the Mid-Term review meeting is reported as follows:

“Everyone agrees” he stated, “that the professional development of teachers is crucial to education quality.” He said that COL has done some work on the professional development of staff in the education sector generally and that a number of Jamaican educators have been assisted in getting masters degrees in distance education at the Indira Gandhi National University in India through Rajiv Gandhi fellowships. He added that when students stayed home to study, the chances of them leaving the country and therefore becoming part of the brain drain was significantly less, hence governments should support distance study and education (Commonwealth Secretariat, 2005b:14–15).
One reason often cited for countries (both industrialised and developing) needing to resort to international recruitment of teachers to maintain their schooling systems is that their own human resource planning – especially in respect to teacher supply and demand – is poor.

The Protocol insists that it is the responsibility of governments in both recruiting and source countries to improve their planning of teacher supply and demand to limit the need for recruiting teachers from other countries, and it adds for good measure that countries need to pay more attention to the issue of teacher retention in order to reduce the attrition of already qualified teachers:

3.1 It is the responsibility of the authorities in recruiting countries to manage teacher supply and demand in a manner that limits the need for resort to organised recruitment in order to meet the normal demand for teachers. At the same time the right of any country to recruit teachers from wherever these may be obtained is recognised (Commonwealth Secretariat, 2004:9).

4.1 It is the responsibility of source countries to manage teacher supply and demand within the country, and in the context of organised recruitment. The country should have effective strategies to improve the attractiveness of teaching as a profession, and to ensure the recruitment and retention of qualified teachers in areas of strategic importance. Source countries should be advised of the necessity to establish policy frameworks which set out clear guidelines as to categories of teachers whose recruitment they will not support, in order to protect their most scarce resources (Commonwealth Secretariat, 2004:14).

These themes are also found in the UN report: “…There is a need for states to develop forward-looking policies that take realistic account of their long-term structural demand for both low-skilled and highly skilled workers …” (United Nations, 2006:17), and also:

Because low-income countries are the most likely to be detrimentally affected by the emigration of skilled persons, it is important to consider ways of mitigating these effects. The most important measure may be to adjust training to existing needs and to make it responsive to local conditions. Both countries of origin and countries of destination need to make better assessments of which needs they require in the immediate and long term and to devise plans to meet them. In countries of destination, these measures may reduce the demand for foreign skilled workers over the medium or long term. In countries of origin, the expansion of training may reduce shortages even if migration continues. Regional arrangements for the training of personnel critical to the provision of basic services, such as education and health, may be developed with the support of donor Governments and through public-private or private-private partnerships (United Nations, 2006:62).

If teacher supply and demand is indeed becoming less confined within country boundaries, and more international, and migration is likely to remain high, then this creates pressure for the coordination of teacher qualifications. The coordination of teacher qualifications is needed to consolidate the link between international migration and the co-development that the United Nations Report maintains is one of the key benefits of international migration.

The need for countries to pay better attention to the retention, deployment and conditions of service of their skilled professionals – especially those in the essential fields of health and education – in order to ameliorate shortages is emphasised across a range of documents.

The ILO/UNESCO Recommendation Concerning the Status of Teachers, adopted 40 years ago (5 October 1966) by a Special Intergovernmental Conference on the Status of Teachers, expresses the point as follows:

145. Authorities should recognise that improvements in the social and economic status of teachers, their living and working conditions, their terms of employment and their career prospects are the best means of overcoming any existing shortage of competent and experienced teachers, and of attracting to and retaining in the teaching profession substantial numbers of fully qualified persons (ILO & UNESCO, 1966:14)
The UNESCO 2006 report, *Teachers and Educational Quality: Monitoring Global Needs for 2015*, outlines the purpose of its final chapter as follows:

After identifying the current and future gaps in teacher quantity (Chapter 1) and quality (Chapter 2), this final chapter examines several important areas for potential policy trade-offs to bridge the two, with the goal of achieving universal primary education by 2015. It focuses on three key issues: teacher recruitment, deployment and conditions of service. It examines whether there is the potential, at the country level for policy options to improve the use of existing teacher supply without expanding the stock of teachers (UNESCO, 2006:78).

The United Nations report, *International Migration and Development*, makes fundamentally the same point:

Small national economies are most vulnerable to “brain drain”, particularly in such crucial sectors as health and education. For example, between 50 and 80 percent of all highly educated citizens from several small countries in Africa and the Caribbean live abroad. These countries need assistance both to train enough skilled workers and to retain them, since crushing workloads, lack of proper supplies, limited career prospects, professional isolation and inadequate pay contribute to a low rate of retention of skilled personnel (United Nations, 2006:14).

And, subsequently it adds:

Retaining needed workers is ... essential. To that end, countries of origin must focus on increasing job opportunities and improving the working conditions of skilled workers, both by fostering career opportunities and providing adequate pay (United Nations, 2006:20).

### 1.9 The need for the coordination of teacher qualifications

The ILO/UNESCO Recommendation Concerning the Status of Teachers of 1966, in harmony with one of its guiding principles – that teaching should be regarded as a profession – recommends that:

18 (1) Fair consideration should be given to the value of teacher preparation programmes completed in other countries as establishing in whole or in part the right to practise teaching.

18 (2) Steps should be taken with a view to achieving international recognition of teaching credentials conferring professional status in terms of standards agreed to internationally (ILO & UNESCO, 1966, Paragraph 18).

Four decades on the United Nations report, *International Migration and Development*, makes fundamentally the same recommendation, and links it to the ways in which development, as one of the principal potential benefits of international migration, can be maximised:

Countries admitting highly skilled migrants should facilitate the recognition of their degrees or qualifications so that their skills will not be wasted ... (United Nations, 2006:19).

Views such as those expressed in the previous section have considerable intuitive appeal, but in the case of teacher qualifications they run into three kinds of difficulties. One difficulty is that the extent to which teacher qualifications of a country are recognised internationally can serve as an invitation for qualified teachers to migrate; a second is how qualifications, and particularly teacher qualifications, can be compared with each other; and a third is that teacher qualifications, unlike “technical” qualifications in, say, engineering or construction, are strongly embedded socially and culturally.

The first difficulty in calling for cross-country recognition of teacher qualifications raises a paradox that is faced acutely by smaller countries. If their teacher qualifications are recognised in other countries then the employment market for the teachers they qualify is not limited to the home country but is broadened to include any country that recognises their teacher qualifications. The internationalisation of teacher demand, which is a consequence of the international recognition of teacher qualifications, makes national teacher supply and demand planning even more hazardous than it already is. If demand becomes more “internationalised”, then projecting demand...
becomes at least, hugely more problematic, and harmonising supply and demand becomes almost impossible.

Another problem is that the public resources that are “invested” in the training of teachers for a country’s schooling system might not yield the expected returns in the form of qualified teachers for that schooling system. How can it be justifiable to use the public resources of, for example, a relatively poor country to qualify teachers for employment in what might be a relatively rich country? One way of avoiding such “teacher loss” would be to make sure that one’s teacher qualifications are not recognised by other countries, or “internationally”.

But this runs contrary to what is a widely held aspiration, related to the quality of qualifications, namely to align national qualifications to international standards – and this is especially the case if, as with the UNESCO/ILO view, the status of teachers is understood in terms of teaching being regarded as a profession. Professions and professional ideals cannot remain confined within national boundaries.

It might help us to sidestep this apparent contradiction if we assume that the main purpose of qualifications is to provide information for potential employers. Coles refers to an OECD definition of a qualification, and it includes the following statement: “A qualification confers official recognition of value in the labour market … “ (2006:3).

That this is a widely held view about the purpose of qualifications is shown by the fact that in countries characterised by strong federal systems, with relatively autonomous (provincial) schooling systems, such as Canada and Australia, there are sometimes difficulties about the recognition (coordination) of teacher qualifications across jurisdictions. Qualifications might not be portable across provincial boundaries even within countries, and this is because employers are empowered to decide whether or not to “recognise” a qualification.

If an employer “recognises” a qualification this means that she trusts that the qualification reliably signals the achievement of particular attainments.

The underlying reason for wanting to investigate the recognition of teacher qualifications across Commonwealth member states relates to the relationship between the qualifications and the employment status of recruited teachers. This is discussed in greater detail in Section 3 of this report.

But the comparison between qualifications and the judgements we make about which are equivalent to each other must rest on more than merely what might be the whims or prejudices of employers. How can we (do we) compare qualifications? This question poses a real challenge. The International Standard Classification of Education (ISCED) proposes a formal answer to this question. The answer is not likely to be very useful except in relation to the compiling of statistical data across countries. Qualifications Frameworks, which set out to align qualifications with each other, are based on an acknowledged or unacknowledged response to this question.

Chapter 2 of the UNESCO document Teachers and Educational quality: Monitoring Global Needs for 2015 sets out to “assess the current status of the ‘quality’ of teachers across the world” and it notes that such a project is difficult because:

Teacher quality encompasses a range of skills, competencies and motivation. As common sense suggests, specific training is required in order to expect quality services from a teacher or any other skilled professional. Data on training levels are one of the few indicators systematically collected about teachers. This highlights the need for better measures of teacher quality that can be used to compare countries (UNESCO, 2006:49).

Coles (2006:14) notes that “The identification and use of elements of competence to define occupations, work roles, training and qualifications developed a strong momentum in the late 1980s”, and notes that this convinced many experts that to define qualifications in terms of achieved competence moved the debate to a new level of understanding. He offers a composite definition of “competence”:

Competence is an ability that extends beyond the possession of knowledge and skills. It includes the following elements: (i) cognitive competence involving the use of theory and concepts as well as informal tacit knowledge gained experientially; (ii) functional competence (skills or know-how), those things that a person should be able to do when they work in a given area; (iii) personal competence involving how to conduct oneself in a specific situation; and (iv) ethical competence involving the possession of certain personal and professional values (Coles, 2006:14).
This is an important point that is discussed in greater detail in Sections 2 and 3 of this report.

1.10 Concluding comments

In this introductory section of the report we have provided a detailed description of the context that we have set out to investigate, namely the recognition and transferability of schoolteacher qualifications and professional registration status across Commonwealth countries. In summary, this section has highlighted a number of contextual aspects, including the following:

- The migration of teachers, both in the Commonwealth and more broadly, is not an isolated phenomenon but needs to be understood in the wider context of increasing international migration.
- The flow of migrants is unlikely to slow down in the near future. What we need to do is to manage it to maximise its benefits and minimise its costs.
- When skilled migrants are compelled to work at jobs that are not commensurate with their qualifications, their capacity to contribute is compromised.
- Teacher shortages are becoming more prevalent in many countries around the world, as much in industrialised as in developing countries.
- One reason why countries (both industrialised and developing) need to resort to international recruitment of teachers to maintain their schooling systems is that their own human resource planning is poor.
- The extent to which teacher qualifications of a country are recognised internationally, can serve as an invitation for qualified teachers to migrate.

As we now proceed to the subsequent sections that focus on qualifications frameworks and teacher professional status, we gradually move towards making recommendations for systems and criteria necessary to assess the comparability of qualifications and professional registration across the Commonwealth. Clearly, we do not suggest that these recommendations necessarily provide immediate solutions to longstanding problems with teacher migration. We do, however, suggest that, in the light of recent developments (particularly national and regional qualifications frameworks) new approaches to old problems are possible.
SECTION 2: THE ROLE OF QUALIFICATIONS FRAMEWORKS IN THE HARMONISATION OF TEACHER QUALIFICATIONS

2.1 Introduction

This section focuses on the role of national and regional qualifications frameworks towards the harmonisation of teacher qualifications. Based on the virtually unanimous call for harmonisation of qualifications (such as the ILO, ADEA, SADC, ECOWAS, COMESA, CARICOM, EU, AU, the Commonwealth and UNESCO, to mention but a few), qualifications frameworks come to the fore as the most obvious tool to achieve this goal:

There is increasing activity from international agencies in the area of qualifications frameworks: the Organisation for Economic Cooperation and Development (OECD), the International Labour Office (ILO), the World Bank (WB), and the European Union (EU) have current NQF projects. Countries with explicit frameworks (e.g. the countries of the UK, Ireland, Australia, New Zealand and South Africa) are regularly engaged with other countries and are, in effect, supporting a general international movement towards the development of qualifications frameworks (Coles, 2006:4).

In this section we consider the extent to which such expectations can be met, the extent to which such expectations are unrealistic, and most importantly for this study, we try to unpack more detailed aspects on how qualifications frameworks can be utilised to facilitate the recognition of teacher qualifications across Commonwealth Member States.

This section is structured according to the following headings:

• Qualifications frameworks as a global phenomenon
• Do qualifications frameworks provide the answers to cross-country recognition of teacher qualifications?
• The recognition of teacher qualifications across Commonwealth Member States
• Recommendations for coordinating the recognition and transferability of (teacher) qualifications in the Commonwealth through qualifications frameworks

2.2 Qualifications frameworks as a global phenomenon

Qualifications frameworks gradually started to emerge in the late 1980s to mid 1990s. With strong roots in the then competency-based movement in the United Kingdom, and strongly influenced by the emphasis on lifelong learning in Scotland, the first generation of qualifications frameworks were established in six countries between 1989 and 1995: New Zealand, Australia, England, Scotland, Ireland and South Africa. Better known by the more accurate description of “National Qualifications Framework” (NQFs), each of the countries opted to implement an NQF for often very different reasons. For Scotland and Ireland, and to some extent also England, it was to improve articulation between already established systems; for Australia the NQF offered a way to modernise its education and training system and respond to the demands of labour markets; for South Africa, and also to some extent New Zealand, it was about transformation and redress. The point here is that while each of the six NQFs had obvious similarities in order to be recognised as an NQF, there also exist significant differences in terms of their purposes, scope and architecture, to name but three aspects. (We return to this point later in this section.) Second generation NQFs (those developed after the six countries mentioned previously, in the period 1996 to 2004) soon started developing across the globe. A recent review of such developments by Mike Coles from the Qualifications and Curriculum Authority (QCA) in England suggests that at the time of the compilation of this report (2006) there are more than 50 NQFs in the world, including at least three regional qualifications frameworks in various stages of development, namely the Southern African Development Community Qualifications Framework (SADCQF) in the SADC region, between English-speaking Caribbean countries and in the European Qualifications Framework (EQF) in the European Union.

Of the nine countries included in this study on teacher qualifications (India, South Africa, Canada, Australia, Mauritius, Sri Lanka, England, Northern Ireland, Jamaica) the majority have fully functional NQFs, while all others, with the exception of India, are at the very least in some stage of NQF development:
Mauritius has been developing a comprehensive NQF since 2002.
South Africa has a comprehensive eight-level NQF, developed since 1995, and currently being reviewed for improvement.
Australia has a comprehensive NQF based on reference qualifications, also implemented since the 1990s.
England has had an NQF for some time and is currently considering moving towards a “Framework for Development” that will, in effect, be a move towards a fourth generation NQF that takes into account some of the problems associated with earlier generation NQFs.
Northern Ireland has an established NQF, based on 8 levels and learning outcomes, with a credit transfer system currently under development.
Sri Lanka is currently considering an NQF for higher education.
Canada is involved in early discussions on an NQF.
Jamaica has made progress in the vocational sector but has as yet not embarked on the development of a full NQF.

While the potential benefits of NQFs differ from country to country, and even more so from the unique design of each NQF, there is overwhelming evidence that NQFs are a global phenomenon. In the next section we take a closer look at the extent to which NQFs provide answers to cross-country recognition of qualifications.

2.3 Do qualifications frameworks provide the answers to cross-country recognition of teacher qualifications?

In the context of this study on the recognition and transferability of teacher qualifications across countries in the Commonwealth it is useful not only to take a closer look at what constitutes an NQF, but also to reflect critically on the promises and problems associated with NQFs. While we are not the first to engage with this issue (see the Report of a Commonwealth Seminar held in Wellington, 2003 edited by Gari Donn and Tony Davies), we consider it appropriate to revisit some of the earlier debates, to raise new issues, and more importantly, reflect on how each of these impact on the extent to which NQFs provide the answer to cross-country recognition of teacher qualifications.

What is an NQF?

Firstly, we need to agree on what constitutes an NQF. A useful point of departure is the following commonly embraced definition:

A National Qualifications Framework is therefore taken as a classification system that has its governance located at a national level, often directly or indirectly financed, monitored and managed by government (Coles, 2006:1).

Another similar interpretation is suggested by UNESCO (2006:23):

The range and diversity of needs which have to be met by a system of qualifications is very great. For individuals trying to use qualifications and for others such as employers who need to understand the qualifications which prospective employees might have, this range and diversity can be daunting. The concept of a national framework is a means of bringing order into the complex world of qualifications.

According to the UNESCO (ibid.) report, the aims for which NQFs have been developed include the following:

• Promoting lifelong learning for economic or social reasons
• Regulating qualifications and qualifications bodies to improve the quality and comprehensiveness of their provision and/or to reduce duplication
• Increasing the recognition of qualifications within the national systems or internationally
• Improving the quality assurance of the qualifications system(s) which it incorporates
• Improving communication and understanding of qualifications by stakeholders.
While we agree that such definitions and aims encapsulate critical aspects of an NQF, we want to argue that an NQF is more than a “framework of qualifications”, a quality assurance system, or even a more traditional system that recognises and benchmarks qualifications and occupations in a particular country or region.

As many readers of this report may agree, such a broader understanding of what constitutes an NQF has not been well articulated within the current NQF discourse, much less so in the broader education and training community – probably for very good reasons. Our attempt, as discussed here, is not intended to offer a seminal insight, but should rather be viewed in the context of this study on teacher qualifications and the experience of the authors in working for the South African Qualifications Authority. In brief, it is our understanding that the NQF phenomenon has offered governments over the world a mechanism to achieve very specific purposes in their countries, some which were alluded to at the start of this section. These purposes include redress and transformation, parity of esteem, integration/unification of education and training, quality improvement, various levels of prescriptiveness, vertical and horizontal articulation, mobility, credit transfer, recognition of prior learning, delineation of the roles of quality assurance agencies, etc. A good example of a qualifications framework being used for more than just qualifications, is the EQF:

The final example of a framework being used for purposes that lie outside the education and training system is the European Qualification Framework which has its principal aim linked firmly to the Lisbon goal of more and better jobs for all European citizens and the creation of Europe as a top performing knowledge economy (Coles, 2006:21).

As many more characteristics can be added to this list, and as some authors have developed a typology to describe such characteristics (see recent work by Young, 2005, Raffe, 2005, Granville, 2004, Zuniga, 2003, Tuck et al., 2004 and Keevy, 2005), our point is that NQFs can be best described on a continuum, ranging from weaker to stronger interpretations. On the weakest extreme the NQF is limited to being a “framework” (also referred to as the “jungle gym” interpretation) on which qualifications are pegged; on the strongest extreme the NQF is viewed as a “social construct” that can be used as a mechanism to transform an education and training system and correct historical imbalances. It is not our intention in this report to offer an extensive critique on these interpretations, but rather to make a few observations that, at least in our view, are relevant to the recognition of teacher qualifications:

- While NQFs have offered significant benefits to many of the countries that have chosen such a route, the experiences have not been without problems (this point is further discussed in the second observation below).
- Not all countries need NQFs to have effective education and training systems. A common misconception associated with the “NQF movement” is that countries without NQFs are ignoring best practice and will be unable to compete in the global arena. This point was recently emphasised by Higher Education Ministers from the SADC region (March 2006) when they discussed the proposed SADC regional qualifications framework.

**Strengths and weaknesses of qualifications frameworks**

Secondly, an attempt to answer the question whether qualifications frameworks provide the answers to cross-country recognition of (teacher) qualifications begs a closer investigation into the strengths and weaknesses associated with NQFs in general. As mentioned earlier, this is not the first time this question is asked in the Commonwealth. The proceedings of a conference in 2003, *Promises and Problems for Commonwealth Qualifications Frameworks* (Donn and Davies, 2003) already suggested some response to such a question. The following is a brief summary of some of the promises and problems mentioned at the time, and this is followed by a discussion of recent considerations.

Weak frameworks are the most successful but also achieve the least – weaker frameworks (see the earlier point on the differences between “weak” and “strong” frameworks) generate less opposition, but also achieve little and “...may even act as a barrier to its own goals if it is not coordinated within local and regional developments” (Young in Donn and Davies, 2003:7).
Epistemological concerns – NQFs find themselves located in an epistemological cul-de-sac. As argued by, amongst others, Johan Muller and Michael Young, the “standardisation” associated with NQFs is seen to limit the extent to which different kinds of knowledge can be structured – one example is the incompatibility between the competitive principles that underpin marketisation, and the trust and cooperation needed within educational practices.

Intrinsic and institutional logics need to be aligned – a mismatch between intrinsic logic (alignment with other national policies) and institutional logic (take up of NQF policy on a more institutional level) often leads to severe implementation difficulties (see Raffe, 2005).

Originally agreed features may be lost during implementation – as also noted by David Raffe, features agreed to at the outset of NQF development often come under pressure as implementation gathers pace. In the Scottish context he suggests that it is the features of incrementalism, voluntarism, partnership and pragmatism that may come under pressure.

Significant variations in the governance of NQFs – the bureaucratic nature of the agencies tasked to oversee NQF development and implementation vary greatly. In Scotland the overseeing body is “not a central bureaucracy or authority which directs or has authority over the awarding bodies or which has its own existence beyond the collective will of its constituent parts” (Ponton in Donn and Davies, 2003:28), while in South Africa, the South African Qualifications Authority is established by an Act of Parliament, placed under the Ministry of Education and has overall responsibility for NQF development and implementation. An important point in this regard, is that increased state control leads to improved educational choices and increased participation in post-compulsory education and training, but it also leads to limitations being placed on education and training providers to offer market-based qualifications (Philips in Donn and Davies, 2003:43–44).

All countries need to benchmark their qualifications – all NQFs, at least to a greater or lesser extent, attempt to provide a common understanding of qualifications, approach to the design of qualifications, relationships between qualifications, progression routes, credit transfer and learner achievements. Most countries (if not all) require their qualifications to be benchmarked against those offered in other countries in order to create the opportunity for, at the very least, the recognition of the qualifications of immigrant labourers.

Small states use NQF for different reasons – in small states (such as the Seychelles, Lesotho and others) NQFs are “intended to facilitate the mobility of learners and skills between, rather than within, countries” (Holmes in Donn and Davies, 2003:98).

Furthermore, small states need to strengthen local and regional research capacities so that they can take ownership of the policy decisions that will affect their own future development. NQFs need to accommodate the needs and aspirations of the societies in question and should be owned by the relevant stakeholders.

Achieving local relevance and international portability is a dilemma. NQFs, or even a Commonwealth regional qualifications framework, would help improve the mobility of learners and skills, but this impact could be uneven. For producers of educational services Commonwealth students are a lucrative market, whilst for consumer countries [an RQF] may offer a small proportion of the population a “skills passport” to more affluent countries (Holmes in Donn and Davies, 2003:102). Learners choose courses that may not be located on the NQF as it is difficult for a small state to keep up with new developments, which leads to the gradual undermining of the state. The encroachment of “international” standards can also undermine indigenous knowledge, skills and values. Holmes (in Donn and Davies, 2003:104) makes an important point with regards to NQFs in small states:

…the concept of an “National” qualifications framework appears something of a misnomer in small states… qualifications frameworks in small states may need to be rational, regional and international in their intent,
Their design and implementation process in small states should reflect their special circumstances and characteristics and be sensitive to culture and context.

NQFs have yet to deliver on their promises – national and regional qualifications frameworks, as well as the call for authorities to run them, have been a feature of the education and training in the Commonwealth for more than 20 years. While frameworks have positively contributed to many aspects of education and training, there is no convincing evidence that the current generation of NQFs are without problems. According to Gunning (in Donn and Davies, 2003:153) “neighbourhood” still remains a key to the recognition of qualifications in the Commonwealth:

...at the moment at least...the high added value for students and employees comes from neighbourhood, rather than from Commonwealth qualifications frameworks.

As an alternative, Gunning suggests that an Association of Commonwealth Qualifications Authorities (ACQA) could add to the work of regions and countries, without necessarily adding to bureaucracy. He makes the point that accountability and quality assurance of qualifications is one area in which collaboration between Commonwealth qualifications authorities would be welcomed.

More recent debates associated with national and regional qualifications frameworks, and the extent to which they provide the answers to cross-country recognition of qualifications include the following:

Using and developing communities of practice – there is a growing awareness that Etienne Wenger’s work on communities of practice has much to offer to address some of the problems associated with NQF development. Related to Dennis Gunning’s call for “neighbourhood” and trust, Etienne Wenger suggests that a community of practice is:

...a set of relations among persons, activity and world, over time and in relation with other tangential and overlapping communities of practice. A community of practice is an intrinsic condition for the existence of knowledge (Lave & Wenger, 1991 in Parker, 2006:7).

In this respect, Ben Parker has recently revisited an earlier suggestion made in a South African consultative document on NQF review (South African Departments of Education and Labour, 2003) that one way to use (and develop) communities of practice within the South African NQF environment is to consider a “nested model” of qualifications, where:

...the descriptions provided move from the universal and abstract to the particular or specialised and concrete. From generic level descriptors to specialised qualifications (Parker, 2006:22).

According to Parker the generation of level descriptors and qualification types comes from the “centre” where the relevant qualifications authority working with expert project teams represents:

...important communities of practice that constitute major stakeholder groupings... These will be large communities of practice that are themselves constituted by more specialised communities... (ibid.).

In the next layer “more autonomy is given to project teams that may come from different sectors, for example, higher education, professions, occupations” (ibid.), while still being driven centrally. The diagram below illustrates this “nested principle” approach to qualifications design:
Related to the notion of communities of practice have been the calls for “communities of trust” (Young, 2003) and the creation of “zones of mutual trust” (Coles and Oates, 2004), mainly in the context of the European regional qualifications framework. While a more detailed analysis of these various options lies outside the scope of this report, they all have one thing in common, namely qualifications framework development is highly dependent on trust between individuals, groups of practitioners (as embodied in codes of conduct overseen by professional bodies and/or councils, and well described by Wenger’s notion of a community of practice), sectors, countries and even regions. Building such trust can be facilitated but not rushed; in most cases trust is built over many years of working together and finding common solutions to common problems. Qualifications frameworks, both national and regional, that are not incremental in nature will always be held at ransom to this principle. South Africa is a case in point. Rapid and comprehensive implementation has been necessary but this national imperative has not been able to avoid the NQF being taken back, on numerous occasions, to concerns about the extent to which trust has been built and stakeholder involvement has been accommodated (see Waghid, 2006).

A move to “meta-frameworks” – the European Qualifications Framework (EQF) is described as a “meta-framework”, a particular type of regional qualifications framework that is more enabling and less prescriptive (also see Tucket et al., 2005). In the context of the EQF a meta-framework is defined as follows:

A meta-framework can be understood as a means of enabling one framework of qualifications to relate to others and subsequently for one qualification to relate to others that are normally located in another framework. The meta-framework aims to create confidence and trust in relating qualifications across countries and sectors by defining principles for the way quality assurance processes, guidance and information and mechanisms for credit transfer and accumulation can operate so that the transparency necessary at national and sectoral levels can also be available internationally (Commission of European Communities, 2005:13).

NQFs continually change and evolve – in the United Kingdom there is general support for the view that “Regulatory Authorities should focus on the reform of the NQF rather than developing a new framework” (CEA, 2005:7). According to the CEA benefits of a gradual “evolution of the NQF” include stability for learners and employers and the opportunity to embed credit into qualifications in a structured and managed way. Features of the new framework include less complexity, greater responsiveness, a more inclusive and diverse environment and reduced bureaucratic intrusion. In a recent paper, Jim Gallacher expresses a similar sentiment, emphasising that NQFs are best understood as “instruments of change” rather than agents of change:
NQFs are best understood as instruments of change, rather than being themselves agents of change. If the expectations of their capacity to engineer change is over emphasised disappointments and frustrations will be inevitable. In the processes of using NQFs as instruments of change the links and relationships with the wider community of organisations responsible for education and training are of crucial importance. Building relationships of understanding and trust, and seeking means of engaging institutions and organisations in ways which they perceive to be in accord with their own agendas, while at the same time introducing change, are important parts of this process (Gallacher, 2006:9).

Recognition of professional qualifications – a number of countries with NQFs are currently engaged in processes to examine the strong distinction between academic and professional qualifications (see Isaacs, 2005, SAQA, 2006 and NQAI, 2002 and 2004). While these processes were yet to be included at the time of the compilation of this report, consensus was being reached on some of the following matters:

- A professional qualification is the recognition of learning that is required toward achieving a professional designation in a profession but does not result automatically in the award of the designation.
- A professional qualification must achieve standards registered on the qualifications framework, must be quality assured and cannot be revoked.
- A professional designation is awarded by a professional body, should not be included on the qualifications framework (that is, in the title of the qualification or in any other manner) and can be revoked.
- CPD courses should not necessarily be included on the qualifications framework, unless they are formal courses already registered.
- The lifecycle of a professional includes education (obtaining a educational qualification); training and experience; assessment of competence leading to registration, admission to practice, licensing where appropriate, and the award of a professional designation; practice, involving the maintenance of competency through CPD, maintaining registration and working to a code of ethics.

Development of generic qualifications – another more recent debate in the NQF discourse focuses on ways and means to avoid the proliferation of qualifications that often overlap and result in problems with articulation and progression. The development of “generic qualifications” against which learning programmes (also referred to as qualifications specialisations) can be registered is viewed as a mechanism to limit the number of qualifications registered on the qualifications framework (SAQA, 2006b).

Access to accurate information on learner achievements – qualifications frameworks include a strong focus on the development of national databases on learner achievements, accredited or registered education and training providers and qualifications. Increasingly, these databases are utilised to inform national and regional policy decisions.

International comparability – embedded within qualifications design in most countries, particularly those with NQFs, is the need for international comparability. Commonly understood as excluding curriculum and subject content, while including more overarching aspects such as levels and credits, there is a clear and urgent need for countries to ensure that qualifications are comparable to those offered in other countries. The existence of national and regional qualifications frameworks facilitates such comparisons.

Reflections on the extent to which NQFs provide the answer to cross-country recognition of teacher qualifications

Thirdly, and based on the preceding discussion, it is evident that the extent to which NQFs provide the answer to cross-country recognition of teacher qualifications appears promising, but is yet to be determined. On some levels national and regional qualifications frameworks offer important positive effects, while on others they actually contribute to difficulties. The following table is a brief overview of both potentially positive and negative effects on the harmonisation of qualifications:
## Strengths of qualifications frameworks

<table>
<thead>
<tr>
<th>Strength</th>
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<tbody>
<tr>
<td>Facilitation of the benchmarking of qualifications and international comparability as a result of a <strong>common approach to qualifications design and agreement on comparability criteria.</strong></td>
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<tr>
<td>Even inherently different education and training systems become <strong>easier to relate to each other.</strong></td>
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<tr>
<td><strong>Migrants move more freely</strong> between countries as principles and processes that improve sectoral, national and international transparency are defined.</td>
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<tr>
<td><strong>Confidence and trust</strong> is built between role-players as communities of practice are recognised and developed.</td>
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<tr>
<td>Recognition of professional qualifications can contribute to the <strong>recognition of professional status.</strong></td>
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<tr>
<td>Access to <strong>accurate information on learner achievements.</strong></td>
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<tr>
<td><strong>Needs of small states</strong> are considered.</td>
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<tr>
<td><strong>Private providers</strong> are able to compete on a level playing field with public providers.</td>
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<tr>
<td><strong>Parity of esteem</strong> between different types of qualifications can be improved.</td>
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</table>

## Weaknesses of qualifications frameworks

<table>
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<tr>
<th>Weakness</th>
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<tr>
<td><strong>Epistemological “straight-jacketing”</strong> of different types of knowledge</td>
</tr>
<tr>
<td>NQFs tend to change continually and may <strong>disrupt education and training systems.</strong></td>
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<tr>
<td>The perception that all countries need NQFs can <strong>drain resources</strong> as countries follow the trend without considering their own contexts.</td>
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<tr>
<td><strong>Contextual factors disregarded</strong> and a ‘‘one model fits all’’ approach is advocated.</td>
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<tr>
<td><strong>Acute standardisation</strong> across countries will limit innovation, negate historical progress and limit contextualisation.</td>
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<tr>
<td><strong>Increased bureaucratisation and regulation</strong> of the system that may impose on the autonomy of institutions.</td>
</tr>
<tr>
<td><strong>Competitive advantage is limited.</strong></td>
</tr>
<tr>
<td><strong>Skilled workers gravitate to developed countries</strong> where circumstances are better.</td>
</tr>
<tr>
<td><strong>Some communities of practice</strong>, such as international professional associations that offer international qualifications, that prefer to remain outside of the framework <strong>are constrained.</strong></td>
</tr>
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</table>

*Table 1: Strengths and weaknesses of qualifications frameworks*
2.4 The recognition of teacher qualifications across Commonwealth Member States

Introduction

The determination of equivalencies between qualifications is notoriously difficult, and is more often than not replaced by a less intensive determination of “comparability”. For this reason, and before attempting to discuss equivalence in the context of Commonwealth teacher qualifications, it is important to first consider what is meant by the various terms (such as equivalence, comparability and others) that very often are used interchangeably. The following definitions are proposed, based on various sources, including the Northern Ireland Credit Accumulation and Transfer Scheme (NICATS) (2000), SAQA (2005) and the Commission of the European Communities (2005):

Qualification

A certificate of achievement or competence specifying awarding body, qualification type and title which makes a learner eligible for consideration for entry, advancement or progression in an academic, vocational or professional context.

Harmonisation (of qualifications)

A continuous process of improving the coordination of qualifications in a particular community of practice, sector, country, grouping of countries or region to promote the movement of labourers.

Harmonisation may include:

- reaching agreement on the development of common approaches to qualifications design (for example in the case of regional “meta” qualifications frameworks), and/or
- reaching sufficient agreement, despite some differences, that qualifications from participating communities of practice, sectors, countries, grouping of countries or regions are recognised (for example, by underwriting national accords, protocols and conventions, e.g. Arusha [1981, revised 2003] and Lisbon [1997]).

Recognition

A process leading to the decision to accept and formally acknowledge a foreign qualification based on either a determination of the comparability of the qualification, and/or the equivalence of such qualification (preferably both) for access related to educational and/or employment opportunities in the receiving country.

Recognition may include:

- determination of comparability of qualifications as a broader process that provides general information on qualifications;
- determination of equivalency of qualifications as a more in-depth process that allows recognition towards another qualification to be made; and
- taking account of design specifications of qualifications in the national qualifications framework of the country of origin.

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1 Our thanks to Nadina Coetzee from the Centre for the Evaluation of Foreign Qualifications at SAQA for making a substantial contribution to this section.
2 Another term that is closely related to harmonisation is “Benchmarking (of qualifications)”. We have not used this term in this report to emphasise a focus on “qualifications” or “professional status”. A suggested interpretation may however be as follows:
3 A process through which bodies involved in the recognition of teacher qualifications align their qualifications against qualifications accepted as standards for entry, advancement or progression. Benchmarking may include:
- determination of equivalency;
- facilitating harmonisation;
- reducing effort and costs in recognising qualifications; and
- improving reciprocity.
Comparability

The extent to which qualifications are found to be comparable based on an analysis of their specifications.

Comparability may include:

• formal acknowledgement by an appropriate national information centre, qualifications authority and/or regional body; and
• transnational recognition of qualifications based on agreement or sufficient agreement.

Equivalency

The extent to which qualifications are recognised towards another qualification within or outside the country of origin based on an in-depth analysis of their specifications.

Equivalency may include:

• formal acknowledgement by a competent recognition authority;
• determination of demonstrated competence through assessment of an individual; and
• transnational recognition of qualifications based on agreement or sufficient agreement.

Considering the definitions listed above, and in the light of the request from the Commonwealth Secretariat to investigate the extent to which teacher qualifications are recognised across Member States, we are of the view that the determination of equivalency is best left to “competent recognition authorities”, in most instances on a case-by-case basis – this process is explained in more detail below. The determination of comparability, on the other hand, is less resource intensive and can, in our view, be conducted by national information centres and national/regional qualifications agencies. The point here is that we consider the determination of “equivalency” and “comparability” of qualifications to be two separate processes that have different purposes. Equivalency is required when an individual requires his or her qualification to be recognised towards another qualification within or outside the country of origin. Comparability, as a broader, less intensive process, is sufficient to facilitate transnational recognition of qualifications.

Diagram 3 illustrates the point that equivalency and comparability are distinct processes, but are not mutually exclusive.
In order to support this view that equivalence and comparability are two distinct processes that have different purposes, and should be conducted by different agencies, we use the next section to explain what system is required for the determination of equivalencies of qualifications, followed by a list of criteria that can be used to determine equivalence. In a similar manner, we explain the system and criteria needed for determining the comparability of qualifications. In the final part of this section, we propose recommendations on how best the comparability of qualifications can be facilitated in the Commonwealth region.

Models for determining equivalency of qualifications

According to a recent SADC report on qualifications equivalencies (SADC, 2006), an emerging model in Southern Africa, and which also exists in many other countries, is the parallel existence of two types of entities that are involved with the evaluation of foreign qualifications:

The first is a National Information Centre (NIC), examples of which include SAQA’s Centre for the Evaluation of Foreign Qualifications and the UK-based National Academic Recognition Information Centre (NARIC). NICs provide information on qualifications (such as the level and scope) following evaluations and analysis of applications.

The second type of entity is referred to as a Competent Recognition Authority (CRA) in the Lisbon Convention (1997), where “competent” refers to a legal status and/or common agreement within a particular community of practice, which allows it to make determinations and application decisions. In some cases the CRA may have the technical ability to determine the equivalence of qualifications, but these processes would ideally be closely aligned to those promoted by the NIC. CRAs refer information on decisions to the NIC that fulfil a guiding function (the diagram at the end of this section summarises the differences in role and function of the NIC and CRAs). Importantly for this research project, a distinction is made between CRAs for academic recognition and CRAs for professional recognition (based on SAQA, 2005):
CRAs for Academic Recognition include higher education institutions and their representative bodies, and focuses on two levels, namely undergraduate, where the emphasis is on access qualifications at school leaving level and their suitability for admission into higher education programmes and determinations are made by matriculation boards and similar bodies; and postgraduate, where the suitability of access qualifications is determined by faculties, schools or departments of individual institutions.

The purpose of CRAs for Professional Recognition is to determine whether the foreign qualification holder possesses sufficient skills and competencies to pursue a particular profession or career in a receiving country. Two different types of professional CRAs are distinguished (SAQA, 2005:13): De jure professional recognition (the recognition of qualifications in professions in respect of law which regulates either the education leading to the pursuit of the profession, the pursuit of the profession itself, or both), and De facto professional recognition (the recognition of foreign qualifications for employment purposes, where neither the professional activity, nor the relevant education, is regulated by law). Examples of CRAs for professional recognition include professional teaching councils, statutory and on-statutory professional bodies, employers and associations.

As will be discussed again later in this section, the CRAs for Academic Recognition in particular, have an important contribution to make to the recognition of teacher qualifications in the Commonwealth, while the CRAs for Professional Recognition have an important dual role. They contribute to the recognition of qualifications as well as to the benchmarking of teacher professional status in the Commonwealth. The latter role is discussed in more detail in Section 3 (The role of professional registration in the benchmarking of teacher professional status), while the combined role is revisited in the final section of this report.

The effective functioning of the NIC–CRA model is highly dependent on the standardisation of processes of evaluation, the agreed status of qualifications across different evaluating bodies and the criteria used to determine the status of each qualification (this is further explained in the section below). The important point here is that a common frame of reference for the development of qualifications and the quality assurance of the provisioning of the qualifications creates an enabling environment for the determination of both comparability and equivalency. It is for this very reason that regional qualifications frameworks, such as in the EU, SADC and the Caribbean, have the potential to make a significant contribution to determining the equivalencies of qualifications across the Commonwealth, but also further afield.

As noted earlier in this section by Dennis Gunning (in Donn and Davies, 2003), despite this potential of qualifications frameworks to play a significant role in the recognition of qualifications, great care should be taken not to see frameworks as the panacea to all the problems faced in a country or region. “Neighbourhood” remains important. Sometimes encountered as bilateral and multilateral agreements, including the mutual recognition of systems and processes, it has been proven over many years that trust between countries will continue to play an important role in harmonisation, with or without qualifications frameworks.
Criteria for the determination of comparability

The following is a suggested list of criteria that can be used to determine the comparability of qualifications. The proposed list, based on criteria used by NARIC, SAQA and SADC, though adapted to suit the Commonwealth context, includes criteria that are readily identifiable when a national or regional qualifications framework exists in the country and/or region. It does, however, not exclude countries or regions that do not have frameworks, as the criteria can also be applied to quality assurance systems that are not necessarily fully fledged qualifications frameworks:

- **Purpose** – the purpose of the qualification as described by its purpose statement.
- **Exit level and/specific outcomes** – the broad outcomes of the qualification.
- **Assessment criteria** – statements that guide assessment of the qualification.
- **Credits** – time taken to complete the qualification (including the time spent during assessment, preparation, tuition and even in the workplace) and which is directly linked to a number of credits as defined on the particular framework.
- **Level** – the level at which the qualification is registered on the particular framework as described by the level descriptors of that framework.
- **Quality assurance** – related to the status of the awarding body. It refers to one or more quality assurance bodies that oversee the provisioning of the qualification.
- **Articulation** – to other qualifications on the same or different levels of the framework.
- **International comparability** – the extent to which international comparability was considered during the development of the qualification.

In our view, the determination of the comparability of qualifications can be done by a national information centre, qualifications authority, a grouping of qualifications authorities, independent agencies or even formal regional associations such as SADC or the Commonwealth.

Comparability offers the opportunity to facilitate harmonisation in a region or grouping of countries without requiring the extensive resources associated with determining equivalence. Comparability also sits well with the notion of a meta-framework where the emphasis is on creating confidence and trust by “defining principles for the way quality assurance processes, guidance and information and mechanisms for credit transfer and accumulation can operate” (Commission of European Communities, 2005:13).

As a final point, it is important to note that this list of criteria for comparability constitutes only an initial attempt that has not been customised within the context of teacher qualifications. It is suggested that the list is refined.

Criteria for the determination of equivalency

The following is a suggested list of criteria to determine equivalency. This list includes the criteria for comparability discussed above, but adds additional dimensions of similarity of content, outcomes and demonstrated competency:

1. **Status of the awarding institution** – the (legal) status of the awarding body and scope of its mandate in the country of origin.

2. **Key elements of the programme leading to the qualification:**
   - **Purpose** for which the programme leading to the qualification was designed.
   - **Entry requirements** – as an indicator of the level at which the qualification is pitched.
   - **Minimum duration** – including whether the programme is offered part-time or full-time.
   - **Structure and type of the programme** – including aspects such as experiential learning, research combined with coursework and work-integrated learning.

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Benefits of using learning outcomes include assistance to employers, higher education institutions and civil society in general by clearly articulating the achievement and attributes associated with particular qualifications; and internationally, learning outcomes contribute to the mobility of students by facilitating the recognition of their qualifications and improving the transparency of qualifications, thus simplifying credit transfer (Coles, 2006:13).
Programme requirements – such as credit totals and distribution, grading, dissertations and internships.

Further access gained by virtue of the qualification – whether full or restricted access, access to general employment, or to a regulated profession or further education at a particular level.

Further rights bestowed on qualification holder – such as the right to use a professional title.

International recognition – the extent to which the programme is already recognised and offered internationally.

Mode of delivery – contact, distance, e-learning, in-service, etc.

Assessment – the different assessment strategies and methodologies used.

Subject content – the extent to which subject content of each qualification is evaluated depends on the capacity of the evaluating agency.

(3) National and/or regional qualifications framework

Purpose – the purpose of the qualification as described by its purpose statement.

Exit level and specific outcomes – the broad outcomes of the qualification.

Assessment criteria – statements that guide assessment of the qualification.

Credits – time taken to complete the qualification (including the time spent during assessment, preparation, tuition and even in the workplace) and that is directly linked to a number of credits as defined on the particular framework.

Level – the level at which the qualification is registered on the particular framework as described by the level descriptors of that framework.

Quality assurance – related to the status of the awarding body. It refers to one or more quality assurance bodies that oversee the provisioning of the qualification.

Articulation – to other qualifications on the same or different levels of the framework.

International comparability – the extent to which international comparability was considered during the development of the qualification.

(4) General considerations

Alignment with policies and guidelines – such as the Commonwealth Teacher Recruitment Protocol or the SADC Protocol on Education and Training.

As noted previously, the determination of equivalence, based on the criteria above, is a resource intensive exercise that is the responsibility of NICs, supported by CRAs (for academic and/or professional recognition). Such evaluations are usually handled on a case-by-case basis.

A proposed methodology for comparing qualifications

The UK Credit Equivalence Project (NICATS, 2003) provides a useful example on which to base a proposed methodology for comparing (teacher) qualifications in the Commonwealth. The Project was a partnership between NICATS, Credit and Qualifications Framework Wales (CQFW), Learning and Skills Development Agency and others, to “establish credit equivalencies for a range of qualifications”. The process involved the following steps:

• Identify specific sectors/areas.
• Identify practitioners (experienced deliverers).
• Survey practitioners to provide their estimates of credit equivalence.
• Analyse survey results, collect and average credit equivalences, and present an interim report to a subject panel.

4 In many cases the evaluation takes place on a broad, rather than an in-depth level, which requires high level expertise and resources. In general, the broader evaluation is conducted by the NIC while the content alignment that requires subject matter expertise is located within the CRAs.

5 Benefits of using learning outcomes include assistance to employers, higher education institutions and civil society in general by clearly articulating the achievement and attributes associated with particular qualifications; and internationally, learning outcomes contribute to the mobility of students by facilitating the recognition of their qualifications and improving the transparency of qualifications, thus simplifying credit transfer (Coles, 2006:13).
• Convene panels of subject specialists to discuss the interim report and agree on recommended credit equivalence.
• Promote staff development.
• Improve understanding.
• Identify individuals with experience in the area.

While we are not advocating the exact same approach for Commonwealth teacher qualifications, we are of the view that the process outlined above is particularly useful and does, with the criteria listed in the previous section, provide a model for achieving a pragmatic solution to determining the comparability of teacher qualifications across Member States.

In addition to the UK Credit Equivalence Project, work that has been done in the educational context, by the International Standard Classification of Education (ISCED) (also see OECD, 1995), in an attempt to categorise education qualifications (including minimum training required to become a teacher in different countries) for the purposes of cross-country comparisons, provides a useful point of departure when considering a methodology for “comparing” qualifications, rather than determining equivalency:

While the classification of educational programmes by level should be based on educational content, it is clearly not possible to directly assess and compare the content of educational programmes in an internationally consistent way. Curricula are far too diverse, multi-faceted and complex to permit unambiguous determinations that one curriculum for students of a given age or grade belongs to a higher level of education than another. International curricula standards that are needed to support such judgements do not as yet exist (UNESCO, 2006:16).

Although the ISCED was not “specifically designed to compare the educational qualifications of teachers” (ibid.), UNESCO suggests that it “affords greater comparability than relying on nationally specific measures of trained teachers or the cumulative duration of schooling required to become a teacher” (ibid.).

The ISCED set of criteria includes the following:

• Programme duration
• Entry requirements
• Theoretical vs. practical/technical orientation

In brief, the ISCED framework is as follows (UNESCO, 2006:53):

**ISCED 2** – Lower secondary: Typically about nine years of schooling.

**ISCED 3** – Upper secondary: Typically between 12 and 13 years of schooling, requiring completion of lower secondary education for entry. ISCED 3A and 3B programmes are designed to prepare students for entry into tertiary programmes at the ISCED 5A and 5B levels, respectively (see below). ISCED 3C programmes generally do not lead to a qualification that would allow entry into tertiary programmes.

**ISCED 4** – Post-secondary, non-tertiary: These programmes straddle the boundary between upper secondary and post-secondary education from the perspective of international comparisons, even though they are often considered as upper secondary or post-secondary programmes in a national context. They are often not significantly more advanced than ISCED 3 programmes, but they serve to broaden the knowledge of participants who have already completed such a programme. The students are typically older than those in ISCED 3 programmes. ISCED 4 programmes typically have a full-time equivalent duration of six months to two years.

**ISCED 5** – Tertiary (ISCED 5A): These programmes are largely theoretically-based and are intended to provide sufficient qualifications for gaining entry into advanced research programmes (e.g. to earn a Ph.D.) and professions with high skills requirements (e.g. medicine, law, architecture and engineering). The minimum duration is three years after completion of an ISCED 3 programme. Tertiary (ISCED 5B): These programmes are generally more practical/technical/occupationally-specific than ISCED 5A programmes. Minimum duration is two years after completion of an ISCED 3 programme.
In this initial/pilot study of nine countries we experienced significant difficulties in comparing the relevant teacher qualifications. In our view, the use of processes similar to the UK Credit Equivalence Project (refocused to look at comparability rather than equivalence) and the ISCED, provides a feasible methodology with which to conduct a detailed study of the recognition of teacher qualifications across the Commonwealth as a whole; an approach that can also be expanded to compare other qualifications.

The diagram below is a summary of the discussions in this section and it emphasises the differences between equivalence and comparability of qualifications, as well as the responsible bodies for each process.

Diagram 4: Equivalency and comparability of qualifications
The following table further explains the differences between the various bodies involved in the recognition of qualifications:

<table>
<thead>
<tr>
<th>Body</th>
<th>Scope</th>
<th>Jurisdiction</th>
<th>Purpose</th>
<th>Role in relation to the recognition of qualifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regional groupings</td>
<td>Conventions, guidelines, protocols</td>
<td>Voluntary participation</td>
<td>Develop guidelines, gather research data</td>
<td>Facilitates comparability</td>
</tr>
<tr>
<td>Qualifications authorities/agencies</td>
<td>National standard setting and quality assurance systems</td>
<td>In most cases statutory, with legal mandate to ensure minimum standards are met</td>
<td>Oversee qualifications framework development and considers international comparability of new qualifications</td>
<td>Facilitates comparability</td>
</tr>
<tr>
<td>National Information Centres (NICs)</td>
<td>Conducts evaluations and advises CRAs, authorities and even regional groupings</td>
<td>On behalf of government, but only advisory</td>
<td>Formal acknowledgement of comparability</td>
<td>Determines comparability</td>
</tr>
<tr>
<td>Academic CRAs</td>
<td>Based on trust within and between communities of practice, with an emphasis on demonstrated competence</td>
<td>Binding (often legally) within the community of practice</td>
<td>Formal acknowledgement of equivalency</td>
<td>Determines equivalency</td>
</tr>
<tr>
<td>Professional CRAs</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 2: Bodies involved in the recognition of qualifications

2.5 Recommendations for coordinating the recognition and transferability of qualifications in the Commonwealth through qualifications frameworks

In this section we have provided a brief summary of both the advantages and disadvantages associated with qualifications frameworks. In doing so, we have tried to present a balanced view on this matter. Importantly for the work of both the Commonwealth Secretariat and Member States, we have argued that there is value to be found in constructive debates about the advantages and disadvantages of qualifications frameworks. In conclusion, we present three recommendations for coordinating the recognition and transferability of (schoolteacher) qualifications in the Commonwealth through qualifications frameworks:

1.1.1 Utilise the advantages of national and regional qualifications frameworks
1.1.2 Develop a qualifications comparability matrix
1.1.3 Establish a formal grouping of qualifications authorities

Recommendation 2.5.1: Utilise the advantages of national and regional qualifications frameworks

Many Commonwealth Member States have NQFs, or are considering NQFs. Even those Member States that do not fit into either of these categories have some form of quality assurance system. In addition, three emerging regional
qualifications frameworks cover Member States. While it has been pointed out that qualifications frameworks are not without problems, and probably still need to fulfil many of the promises associated with them, it has also been clearly shown that they offer many advantages for the recognition of qualifications. These advantages include:

- The benchmarking of qualifications and international comparability is facilitated.
- Parity of esteem between different types of qualifications is improved.
- Professional qualifications are recognised.
- Trust is built between role-players.
- Access to accurate information on learner achievements is available.
- Migrants can move more freely between countries.
- Needs of small states are considered.
- Private providers are able to compete on a level playing field with public providers.

An obvious question that comes to mind is whether there is a need for a Commonwealth meta-qualifications framework that spans across all Member States. In our view, this is not necessary. As pointed out earlier, a number of framework developments have taken, and are taking place among and within Member States that can be utilised rather than duplicated.

**Recommendation 2.5.2:**

Develop a qualifications comparability matrix

We consider a benchmarking exercise necessary to determine the comparability of teacher qualifications across Member States. As suggested earlier in this section, such an exercise should be based on a similar exercise undertaken through the UK Credit Equivalence project, but be customised to look at comparability rather than equivalence. As also mentioned on a number of previous occasions, we are of the view that equivalence is not what is required in order to determine (and improve) the recognition of teacher qualifications across Commonwealth Member States, but that comparability offers a more pragmatic and attainable option that is also better suited to harness the advantages of existing national and regional qualifications frameworks that can be overseen by the Commonwealth Secretariat.

Importantly, the SADC Secretariat, as advised by its Technical Committee on Certification and Accreditation (TCCA), has very recently (30 August 2006) decided to follow the same route. As a number of SADC Member States are also Commonwealth Member States, the comparability process in SADC can add value to a similar process in the Commonwealth. At this stage a draft instrument for collecting information on existing qualifications has been developed. The data gathering is planned for the fourth quarter of 2006, while the final report will be presented to SADC Ministers in March 2007 (SADC Secretariat, 2006).

**Recommendation 2.5.3:**

Establish a formal grouping of qualifications authorities

Related to the previous recommendation, and also currently taking place within SADC in the form of a technical committee, we recommend that Dennis Gunning’s earlier suggestion for an Association of Commonwealth Qualifications Authorities (ACQA) be revisited. Gunning suggested (in Donn Davies, 2003:154) that such a body be made up of voluntary members, and involving national and state qualifications authorities (in our view, this could also include other relevant bodies, such as examinations councils and education departments):

One approach would be…to create a Commonwealth association of qualifications authorities…[that may be] supported by the Commonwealth Secretariat and seen as part of the Commonwealth’s strategic collaboration activities in the field of education and training; there might be an Executive Committee for the planning of activities and events, but his could operate largely by the internet or by teleconference…

According to Gunning (ibid.), the benefits of belonging to such a grouping of qualifications authorities include sharing good (and not-so-good) practice, providing access to expertise for the commissioning of research, providing a forum for future guidance on convergence of legislation, standards, language, definitions, practice or procedures, the development of advice on the export and import of qualifications and other education services between member states, the provision of a “critical friend’s” or potential reviewer’s service and, importantly for the recognition of teacher qualifications, a basis for benchmarking:
In conclusion, this section has included a detailed discussion on the extent to which qualifications frameworks (whether they are national, regional, sectoral or meta-frameworks) are able to meet the expectations for facilitating the recognition of teacher qualifications across Commonwealth Member States. In our view, qualifications frameworks, despite the problems that inevitably accompany them, can offer much in this regard.

As also suggested by Bjarnason (2004:159) the suggestion for a formal grouping of qualifications authorities is in line with the call for the facilitation of international agreements on qualifications frameworks:

The need for international agreements on qualifications frameworks, credit accumulation and transfer and recognition of qualifications has been acknowledged by a number of international organisations... The borders of institutions, level of study, type of provider and the location of learning are becoming increasingly permeable and regulatory regimes need to address this.

6 The NICATS project has identified nine levels progressing from entry to postgraduate – this has included the development of generic level descriptors (based on existing level descriptors in Wales, England, New Zealand and others) that will be used for ascribing credit equivalence.

SECTION 2: THE ROLE OF QUALIFICATIONS FRAMEWORKS IN THE HARMONISATION OF TEACHER QUALIFICATIONS

This might either be as a quality assurance measure where the qualifications body has international comparability as part of its charter or quality criteria, or as the basis for quality assurance of mutual recognition systems (ibid., emphasis added).

In this regard, we want to suggest that the grouping of qualifications authorities and other similar bodies (e.g. certification councils, examinations bodies) from Commonwealth Member States is coordinated by the Commonwealth Secretariat, keeping the following principles in mind:

- Effort is made to liaise with the SADC Secretariat on how best to approach such a venture.
- Member States participate on a voluntary basis.
- Costs of meetings are shared between the Secretariat and Member States.
- A budget is sourced by the Secretariat to support the workings of ACQA to enable decisions to be executed in a timely manner.
- At least one annual meeting takes place.

Responsibilities that ACQA could embrace, include the following:

- Develop a Commonwealth qualifications database (not rigid, electronic, web-based, easy to update), including data on distance and open learning.
- Clarify and communicate qualifications-related terminologies, such as qualification, equivalence, credit and credit equivalence, comparability, level descriptors, credits, and so on.
- Consider the inclusion of key stakeholders, including recognised awarding bodies in Member States.
- Develop a set of criteria for the registration and accreditation of private institutions (this work can be based on progress already made in SADC, EU, Caribbean, etc.) and generally improving the quality and legitimacy of providers (Bjarnason, 2004).
- Possibly agree on the number of levels and develop generic/common level descriptors for a Commonwealth meta-framework.
- Oversee, facilitate and conduct capacity building in Member States that request it, which will in turn lead to the fast-tracking of the development and implementation of NQFs in Member States, including the establishment of national qualifications authorities.
- Develop a credit accumulation and transfer system.
- Suggest “standard” qualification types in appropriate sectors and levels within the Commonwealth.
- In line with the move towards a Framework for Achievement (more recently referred to as a Framework for Development) in the United Kingdom, the ACQA can oversee the design and development of new qualifications so that these adhere to some of the following principles (CEA, 2005:26–28):
  - Rules of combination
  - Core, optional and elective units
  - Standardisation of qualification titles
  - Parity of esteem between qualifications should be ensured rather than emphasising groups or brands
SECTION 3: THE ROLE OF PROFESSIONAL REGISTRATION IN THE BENCHMARKING OF TEACHER PROFESSIONAL STATUS

3.1 Introduction

In this section we focus on the second aspect that is needed to balance the rights of teachers to migrate internationally against the need to protect the integrity of national education systems, namely professional registration. As was illustrated in the previous sections, national and regional qualifications frameworks improve the recognition and transferability of teacher qualifications and, therefore, also facilitate migration; while increased migration, as a global trend that is unlikely to slow down in the future, requires to be managed to maximise its benefits and minimise its costs. In this section we put forward the view that professional registration offers an avenue through which teachers’ professional status can be internationally benchmarked, which, in turn, makes it possible to control teacher migration for the benefit of both the individual teacher and the receiving country; in effect, offering a counter balance to the inevitable increase in the migration of teachers.

We use a broad interpretation of “teacher professional status” that includes aspects such as qualifications, registration with a professional body/council, and continuing professional development (CPD).

The section is structured according to the following sub-headings:

- Enhancing teacher professional status as a global concern
- Does professional registration provide the answer to cross-country recognition of teacher professional status?
- Benchmarking teacher professional registration status in the Commonwealth
- Recommendations for coordinating the recognition and transferability of teacher professional status in the Commonwealth

3.2 Enhancing teacher professional status as a global concern

Formal academic and professional qualifications are necessary for teachers – especially if we are concerned about quality teaching, and its seminal role in quality education – but they are not sufficient. There are dimensions of being a schoolteacher that are at least very difficult to capture in formal qualifications. It is dimensions such as these that we are gesturing towards when we talk of teaching as a profession. In this section of the report we will focus on the professional status of teachers as an important consideration in the migration of teachers.

There are many concerns about the ways in which the status of teachers has deteriorated, in almost all countries, over the past decades. Such deterioration has consequences not only for the daily work of teachers, but also for the retention of teachers in schooling systems and the lack of attractiveness of the profession for new recruits.

The ILO/UNESCO Recommendation Concerning the Status of Teachers, adopted four decades ago (5 October 1966), defines “status” as follows:

*The expression ‘status’ as used in relation to teachers means both the standing or regard accorded them, as evidenced by the level of appreciation of the importance of their function and of their competence in performing it, and the working conditions, remuneration and other material benefits accorded to them relative to other professional groups (ILO & UNESCO, 1966, paragraph 1).*

This definition identifies three main elements of teacher status:

- Standing or regard accorded to teachers in appreciation of the “importance of their function” and “competence in performing it”
- The working conditions of teachers
- Remuneration and other material benefits

Because the status of teachers differs in different countries, all three of these elements are thrown into sharp relief in relation to the international migration of teachers.
In respect to the standing of, or regard accorded to teachers there are some illuminating examples reported in Teaching at Risk (Commonwealth Secretariat, 2003b). Recruited teachers teaching in London reported several difficulties with poorly behaved and unruly children in those schools. An Australian teacher commented that teaching in Australia was “like a walk in the park” in comparison with teaching in London, and a Jamaican teacher, spoke about pupils physically attacking teachers and receiving no response from the authorities to his written complaints. “Yes, you are being pressured to manage your classroom, but how can you manage your classroom if students observe you being disrespected?” (Commonwealth Secretariat, 2003b:25). What such cases are symptomatic of is as much about differences in the status of teachers in different countries, as it is about differences in pupil behaviour. In some countries teachers are more highly respected – by both pupils and the authorities – than in others.

Cross-country differences in working conditions and remuneration of teachers are well known, and frequently mentioned both as a reason for migrating and as something that needs attention to retain experienced teachers in local schooling systems. Migrating teachers often say that one of the main reasons for migrating is their expectation that their professional working conditions and remuneration would be better in the recruiting country, and this is a common theme of reports on international migration. For instance, the UNESCO report Teachers and Educational Quality, under the sub-heading “Brain drain and the international mobility of teachers”, comments as follows: “The migration of skilled workers from poor to richer countries is not a new phenomenon, and remittances from abroad play an important role in many national economies” (UNESCO, 2006:26).

In addition, the improvement of the working conditions and remuneration of teachers in source countries is frequently cited as an important way of retaining teachers in local schooling systems. This was noted four decades ago in the ILO/UNESCO Recommendation Concerning the Status of Teachers:

Authorities should recognise that improvements in the social and economic status of teachers, their living and working conditions, their terms of employment and their career prospects are the best means of overcoming any existing shortage of competent and experienced teachers, and of attracting to and retaining in the teaching profession substantial numbers of fully qualified persons (ILO & UNESCO, 1966, paragraph 145).

The United Nations report International Migration and Development (18 May 2006), referring not only to teachers but to skilled workers more generally, states, “Retaining needed workers is also essential. To that end, countries of origin must focus on increasing job opportunities and improving the working conditions of skilled workers” (United Nations, 2006:62). And the UNESCO report (June 2006), after distinguishing between three groups of countries in terms of whether they need to expand or reduce the size of their teaching force to meet the goal of Universal Primary Education by 2015, concludes as follows:

Ultimately, progress in all three groups of countries will depend on an ongoing commitment to enhance teacher status. This must be the foundation for a comprehensive policy approach which can balance wider education priorities with the actual conditions facing teachers and pupils in the classroom (UNESCO, 2006:103).

The ILO/UNESCO (1966) recommendation states as follows:

Teaching should be regarded as a profession: it is a form of public service which requires of teachers expert knowledge and specialised skills, acquired and maintained through rigorous and continuing study; it calls also for a sense of personal and corporate responsibility for the education and welfare of the pupils in their charge (1966, paragraph 6)

Teachers perform a public service, and there is, thus, a constant tendency to fail to distinguish between teachers as members of a profession (with responsibilities to maintain the ideals of the profession) and teachers as employees (with duties towards their employer – frequently the state Department of Education.) In some situations –such as in South Africa prior to the democratic transition – this tendency becomes more insistent, as the state attempts to maintain control of teaching in the light of its own interests. However, failure to distinguish between teachers as members of a profession and teachers as (mainly state) employees is likely to undermine the key role of teachers in the improvement of the quality of schooling.
Issues about working conditions and remuneration and other material benefits can indeed be addressed by the employers of teachers. But other dimensions of the status of teachers are much more difficult for employers to address in any direct way.

One key characteristic of a profession is its autonomy. The ideals of a profession are ideals of service, but a profession cannot maintain these ideals if it is treated as a servant, or merely a branch of the department of education. “Teachers’ organisations should be recognised as a force which can contribute greatly to educational advance and which therefore should be associated with the determination of educational policy” (UNESCO & ILO, 1966, paragraph 9), but they can perform this role only to the extent that they have an independent voice.

Some employers might think that an emphasis on the autonomy of the teaching profession is a recipe for generating a conflict between teachers as employees and teachers as members of a profession. How can teachers “serve two masters”?

But this is not the case. To the extent that teachers understand themselves as members of a profession with a sense of responsibility for the education and welfare of the pupils in their charge, the status of teachers as members of a profession is something that should be welcomed by their employers. Teachers’ professional commitments complement their duties as employees, and contribute valuably to the quality of their teaching.

3.3 Does professional registration provide the answer to cross-country recognition of teacher professional status?

It is not only the quality of their teaching that the professional status of teachers brings to the way they perform their professional tasks, there is also the crucial issue of the ethical commitments of teachers. Teachers are in a position of power over pupils, and the rights and welfare of children need formal protection from the possibility of abuse from teachers.

Professional Councils are in the best position to fulfil such functions. The ILO/UNESCO Recommendation Concerning the Status of Teachers, recommends that “Codes of ethics or of conduct should be established by the teachers’ organisations, since such codes greatly contribute to ensuring the prestige of the profession and the exercise of professional duties in accordance with agreed principles” (UNESCO & ILO, 1966, paragraph 73).

Six of the countries covered in the current project (Jamaica, Canada, South Africa, Australia, England and Northern Ireland) reported the existence of Professional Teachers’ Councils. As reported earlier, there are no Professional Councils in Mauritius and Sri Lanka and no information available for India. But what is unclear is how vigorous these Councils are in pursuing or defending the professional ideals, or the degree of their independence from the employing authorities. An interesting report from Canada, one which signals the independence of their Teachers’ Council from the employing authorities, is that the Canadian Teachers’ Federation has a campaign to challenge the increasing intrusion of market discourse in relation to schooling policy, and the consequent “commodification” of teaching.

Professional Teachers’ Councils need to be the primary source of authority on the professional dimensions of teaching – including its constitutive ideals and the quality of the competences and commitments of professional teachers. The quality of the competences expected of professional teachers can, to some extent, be assessed in terms of the formal qualifications of teachers (and this is what underlies the usual requirements of qualifications at a particular level for registration with the professional council), but the quality of the expected commitments of professional teachers goes beyond what can be assessed in formal qualifications. Qualifications focus on competences that can be “measured”, but there are some dimensions of professional teaching that cannot be “measured” – certainly not in any direct way.

Professional Teachers’ Councils have typically developed “Codes of Conduct”, to which professional teachers are required to commit themselves when they register. Once this is in place, the Professional Council can monitor the ethical behaviour of members of the profession and sanction teachers who contravene the code – typically, again in terms of disciplinary measures applicable to teachers guilty of breaches.
of professional conduct. Thus, the professional registration of teachers provides evidence, in addition to formal qualifications, about the quality of teachers and, at the same time, a defence of the rights of the children with whom they come into contact in their professional tasks.

No formal cross-country links between Teacher Professional Councils, or formal recognition agreements about cross-country Professional Registration were reported. But Australia reported that they recognise South African Professional Registration.

3.4 Benchmarking teacher professional status in the Commonwealth

Introduction

As was the case with the determination of equivalencies between qualifications, the benchmarking of teacher professional registration status requires a brief consideration of what is meant by each term (as listed in Section 1 of this report):

**Professional registration**

Registration or affiliation with a professional council or body which enables an individual the right to practise as a teacher on a particular level and in a particular country.

Professional registration may include:

- Various requirements, including obtaining an appropriate professional qualification, ongoing training and experience, the maintenance of competency through CPD and adherence to a code of ethics.
- Payment of registration fees.

**Professional status**

A standing, conferred by an appropriate professional council or body, which indicates that an individual has the right to practise as a teacher in a public school.

Professional status may include:

- Need to meet professional registration requirements
- Awarding of a professional designation
- Recognition of being part of a community of teachers who are able to practise in a particular sector, country or region, e.g. Registered Teacher, Qualified Teacher Status (QTS), Licensed Teacher and Certified Teacher.

**Benchmarking of teacher professional registration status**

A process through which teacher professional bodies and councils align their standards for teacher education and professional practice against accepted standards for effective and committed teaching.

Benchmarking of teacher professional registration status may include:

- Development and agreement on a set of minimum standards
- The need for foreign teachers to adapt to local conditions through orientation and induction programmes
- Similarity of employment status, including comparability of qualifications and remuneration
- CPD.

Considering these definitions, and in the light of the request from the Commonwealth Secretariat to make recommendations on how best teacher professional status can be recognised across Commonwealth Member States, we suggest that teacher professional registration, first nationally, and then also regionally, provides a meaningful and pragmatic approach through which national systems can be protected, while simultaneously
improving the recognition and transferability of teacher professional registration status.

In order to further explain our position we use the remainder of this section to explain the systems required for the suggested benchmarking of teaching professional status. In the final part of the section we make recommendations on how best national and regional professional registration processes can be used in the Commonwealth.

Models for benchmarking teacher professional status

As discussed in Section 2 of this report, there exist at least two types of Competent Recognition Authorities (CRAs), with distinct purposes and compositions. The first type, namely the CRAs for Academic Recognition, have an important role to play in the determination of equivalencies of qualifications, although, as also discussed in the previous section, we have suggested that comparability of qualifications (rather than equivalence), conducted by qualifications authorities (or grouping of authorities, independent agencies, regional associations), will make a more meaningful contribution to the recognition and transferability of teacher qualifications across Commonwealth Member States.

The second type of CRAs, namely the CRAs for Professional Recognition, also make determinations and application decisions in respective sectors, but have a specific focus on the skills, competencies and commitments required to pursue a particular profession or career in a receiving country. As also mentioned earlier, examples of such professional CRAs include professional teaching councils and similar professional bodies. Two different types of professional CRAs are distinguished (SAQA, 2005:13):

- *De jure* professional recognition – the recognition of qualifications in professions in respect of law which regulates either the education leading to the pursuit of the profession, the pursuit of the profession itself, or both. An example of such a CRA is a national department of education that evaluates the qualifications of foreign teachers according to criteria informed by the relevant legal requirements.

- *De facto* professional recognition – the recognition of foreign qualifications for employment purposes, where neither the professional activity nor the relevant education is regulated by law. Employers in general could be seen as implied CRAs, although they are not officially charged to make binding decisions.

Once again comparing the academic recognition process, as enabled and facilitated by the development of national and regional qualifications frameworks, and the professional recognition process, it is evident that a “common frame of reference” for professional registration (by the professional CRAs referred to above) is much less developed. To a great extent, this imbalance has directly contributed to the imbalance between the rights of teachers to migrate internationally against the need to protect the integrity of national education systems, as illustrated by Diagram 5.
We therefore suggest that resources are invested to develop a common frame of reference for professional registration of teachers across Commonwealth Member States. Although it may be convenient to premise such a regional approach on the existence of national teacher professional councils, it is evident that such an approach would be problematic. As mentioned earlier in this section, even between the nine countries that were included in this pilot research project, only six reported having professional councils. Assuming, therefore, that not all countries would have national councils, or be in a position to establish such councils, we suggest that, where appropriate and preferable, a Commonwealth forum or federation of professional councils be established and mandated to facilitate the professional registration in specific countries.

While such a supportive function will be an important role for the suggested forum of professional councils, its primary function will be to develop and coordinate a standardised approach for the registration of teachers across Commonwealth countries. When one reflects on similar models used by the engineering fraternity in Europe and elsewhere, a Commonwealth forum of professional councils seems a viable option that will, together with existing national professional councils, be able to protect the integrity of national education systems.

Criteria for benchmarking teacher professional status

The following is a list of criteria for teacher professional status that can be included in a broader framework for professional registration between Commonwealth countries as overseen by a forum (less formal collaboration) or federation (based on binding agreements) of Commonwealth teacher professional councils:

1. Development and agreement on a “Quality Mark” – concern about the activities and methods of recruiting agencies led to the establishment of a set of minimum standards for agencies and local education authorities in such matters as the way in which they recruit teachers in other countries for employment in the UK, the information they provide to the recruited teachers, and how the relocation of recruited teachers is managed. Recruiting agencies that meet the specified standards are awarded the Quality Mark. Teachers and schools who use recruiting agencies that have been awarded the Quality Mark can feel confident about the quality of the services they will receive from those agencies, and at the same time some protection is provided to manage the recruiting of the most valuable human resources of the education systems of source countries. Significantly, the Quality Mark also reflects two of the major concerns of the Protocol: the rights of recruited teachers and the integrity of the education systems of the source country.
(2) Adaptation to local conditions – it is a well-known view that “local” teachers have a linguistic (usually “English”), cultural, political and social advantage within their own countries. Examples of migrant teachers moving between countries with similar language and traditions of the structure of education systems and qualifications nomenclature are a case in point. Some may argue that even teacher qualifications have a “context-embedded character”. Others may even go as far as to say that teaching is a “cultural practice” and the extent to which teaching competence is portable across boundaries is questionable. While we do not want to dwell too much on the merits of such views, it is evident that they are important and cannot be ignored. For this reason we suggest that adaptation to local conditions is included as a criterion and that a teacher in a foreign country be required to demonstrate his/her adaptation to the local conditions. In this regard, the induction and orientation of recruited teachers in a foreign country can make a meaningful contribution to ameliorate the problem, a point made by the Commonwealth Secretariat:

3.14 A recruiting country shall ensure that the newly recruited teachers are provided with adequate orientation and induction programmes, including cultural adjustment programmes, with a focus on the school and its environment (Commonwealth Secretariat, 2004:13).

(3) Similarity7 of employment status – the relationship between the “professional” and “employment” status of teachers is a critically important factor when benchmarking professional status. Related to the “Quality Mark” criterion, it is important that recruited teachers are employed on an “equivalent” level in the foreign country:

3.10 Wherever appointed, recruited teachers shall enjoy employment conditions not less than those of nationals of similar status and occupying similar positions. The recruiting countries should also provide dedicated programmes to enable such teachers to achieve fully qualified status in accordance with any domestic requirements of the recruiting country (Commonwealth Secretariat, 2004:12).

Also:


Related to this point is the case of the para-teachers:

There is also an important distinction to be made between the qualifications needed to do ‘supply teaching’ (or to be a ‘substitute teacher’) and the requirements to teach full-time in the classroom. The different requirement of these two jobs is affecting the supply and demand for teachers and impacting on the labour issue (Commonwealth Secretariat, 2003b:30).

And also:

It is not enough simply to introduce para-teachers into the system – not even the most intensive induction course will rectify the resulting imbalances. It is essential to accompany these individuals and ‘mainstream’ them through regular in-service training, as very successfully done in Bangladesh. Para-teachers must have the opportunity to advance their careers. Without this, failing morale will steadily infect the entire school system, sapping motivation to provide quality education which leads to higher attrition rates (UNESCO, 2006:101).

While there may exist general agreement that schools could be provided with ancillary staff to perform non-teaching duties in order to enable teachers to concentrate on their professional tasks at schools (ILO & UNESCO, 1966), there is a great danger that migrant teachers are appointed in low capacities, and are therefore, in effect, de-skilled in a similar manner as happens with nursing migrants:

…Susan Maybud from the ILO suggested a closer look at the de-skilling of migrants, and mentioned the recruitment of nurses who end up being glorified nannies (Commonwealth Secretariat, 2005:17).

7 The term “equivalence” would probably be better suited to this context but we opted not to use it here so as to avoid confusing it with the specific interpretation associated with the equivalence of qualifications employed in this report.
The United Nations Report (2006:62) concurs in that:

*Countries admitting highly skilled migrants ought to prevent the wastage of their skills by working towards ensuring that their conditions of service and remuneration are similar to those of citizens with comparable qualifications…*

Another aspect related to the similarity of employment status is the remuneration of teachers, in most cases based on the teacher’s professional status or, at the very least, on the recognition of his/her qualifications:

*A teacher with over ten years of experience in Jamaica may arrive as an unqualified teacher in the United Kingdom and be subjected to a different pay scale before obtaining the QTS. How can ten years of experience be assessed and understood in the new (in this case English) context? (Commonwealth Secretariat, 2003b:30).*

(4) **Continuing professional teacher development** – another well accepted practice is that teachers are required to participate in CPD. Importantly, in the context of migrant teachers, CPD can facilitate adaptation to local context:

*Participation in professional development activities has been shown to have a significant positive impact on teachers’ beliefs and practices, students’ learning and on the implementation of educational reforms (United Nations, 2006:71).*

* Authorities should recognise the value both to the education service and to teacher themselves of professional and cultural exchanges between countries and of travel abroad on the part of teachers; they should seek to extend such opportunities and take account of the experience acquired abroad by individual teachers (ILO & UNESCO, 1966, paragraph 104).

Of course, international migration itself, can be seen as a form of continuing professional development:

*Consistent with the terms of this Protocol, Ministers commit to establishing a working group to identify how teachers across the Commonwealth can have greater access to teaching in other Commonwealth countries as a significant continuing professional development activity. The working group should include appropriate permanent observers from professional organisations and civil society (Commonwealth Secretariat, 2004:18, emphasis added).*

This list of some four criteria that can be included in a broader framework for professional registration between Commonwealth countries is not intended to be exhaustive. On the contrary, we are very aware of the fact that our primary expertise is within the field of qualifications and quality assurance, and not that of the functioning of professional councils. Additional criteria for consideration may include the following:

- The differences between a “forum” and a “federation” and which would best suit the Commonwealth context.
- Developing a “formula” for each Member State to move towards increased standardisation.
- Establishing a designation (based on agreed criteria, such as the “Quality Mark” discussed above) for Commonwealth teachers, such as “Commonwealth teacher”.
- A decentralised register to which signatories (i.e. Member States) upload their list of nationally registered teachers that meet the broader criteria of the Commonwealth Forum of Professional Councils.

A final criterion that is vitally important to protect national systems, is a regulating (even gatekeeping) function of national councils that can be greatly enhanced by a Commonwealth-wide approach to professional registration status. As is the case with some other professions, we are of the view that a national teacher council (if there is none, then this responsibility could be absorbed by the Forum), in collaboration with various other stakeholders such as the national departments of education, has an important responsibility for effectively and proactively coordinating human resource development in its sector. As mentioned before, both industrialised and developing countries are notoriously poor at doing this, resulting in the need to recruit teachers from abroad to maintain their own schooling systems.
On the one hand, this is probably our most radical suggestion as we have investigated the recognition and transferability of teacher qualifications and professional registration status. On the other hand, we see this as the most appropriate and viable option available to Commonwealth Members States – an approach that is already, to a lesser or greater extent, being practiced in some countries.

We put forward these criteria as a starting point for further investigation that needs to be undertaken on this matter.

The diagram below is a summary of the discussions in this section and illustrates the suggested role of a forum or federation that oversees teacher professional registration across Commonwealth Member States.

**Diagram 6: Benchmarking teacher professional status**
The following table further explains the differences between the various bodies involved in the benchmarking of teacher professional status:

<table>
<thead>
<tr>
<th>Body</th>
<th>Scope</th>
<th>Jurisdiction</th>
<th>Purpose</th>
<th>Role in relation to the benchmarking of teacher professional status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federation or Forum of Professional</td>
<td>Conventions, guidelines, protocols</td>
<td>Voluntary participation</td>
<td>Develop guidelines, gather research data</td>
<td>Determines cross-country benchmarks</td>
</tr>
<tr>
<td>Recognition CRAs</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>National Information Centres (NICs)</td>
<td>Conducts evaluations and advises</td>
<td>On behalf of government, but</td>
<td>Formal acknowledgement of comparability of</td>
<td>Informs benchmarking</td>
</tr>
<tr>
<td></td>
<td>CRAs, authorities and even</td>
<td>only advisory</td>
<td>qualifications</td>
<td></td>
</tr>
<tr>
<td></td>
<td>regional groupings</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Academic CRAs</td>
<td>Based on trust within and between</td>
<td>Binding (often legally) within</td>
<td>Formal acknowledgement of equivalency of</td>
<td>Determines national benchmarks</td>
</tr>
<tr>
<td></td>
<td>communities of practice, with an</td>
<td>the community of practice</td>
<td>qualifications</td>
<td></td>
</tr>
<tr>
<td></td>
<td>emphasis on demonstrated competence</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Professional CRAs</td>
<td></td>
<td></td>
<td>Formal acknowledgement of skills and</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>competencies to pursue a profession</td>
<td></td>
</tr>
</tbody>
</table>

*Table 2: Bodies involved in the benchmarking of teacher professional status*

### 3.5 Recommendations for coordinating the recognition and transferability of teacher professional status in the Commonwealth

In this section, we argue strongly for a Commonwealth-wide approach to the recognition and transferability of teacher professional registration. We illustrate the conclusion that enhancing teacher professional status is a global concern not limited to Commonwealth Member States. We provide a justification for the need for a Commonwealth forum of professional councils, and have suggested a number of criteria for benchmarking teacher professional status. In all this, our main argument has been the need to balance the rights of teachers to migrate internationally by the effective functioning of teacher professional councils. In this regard, an important action that needs to be taken is a further investigation into the cross-country links between teacher professional councils, the international coordination of the teaching profession, and formal agreements between professional councils in different countries as supported by the United Nations:

*Governments may need to regulate their international activities to prevent their practices from being detrimental to the attainment of the pressing development objectives of low-income countries (United Nations, 2006:62).*
In conclusion, we present three recommendations for coordinating the recognition and transferability of teacher professional registration status in the Commonwealth:

3.5.1 Foster cross-country links between teacher professional councils.
3.5.2 Reinforce the professional status of teachers by developing a Commonwealth standard for professional registration status.
3.5.3 Establish a Commonwealth Forum of Professional Teacher Councils and other de jure CRAs.

Recommendation 3.5.1:
Foster cross-country links between teacher professional councils

Existing links between national teacher professional councils should be further developed across the Commonwealth. Countries without teacher professional councils should be encouraged to establish such bodies, and where this may be difficult, to actively participate in the development of a Commonwealth standard for teacher professional registration. In this regard, it is also suggested that the progress made by teacher unions (such as through the Commonwealth Teachers Grouping [CTG] and Education International) be carefully scrutinised to identify ways in which cross-country links between teacher professional councils can be developed.

Recommendation 3.5.2:
Reinforce the professional status of teachers by developing a Commonwealth standard for professional registration status

As discussed at length in this report the need to improve the professional status of teachers is a global concern that requires a well-coordinated and holistic approach. It is our view, based on the evidence presented in this report that the benchmarking of teacher professional status in the Commonwealth should be based on, amongst others, the following criteria:

• Development and agreement on a “Quality Mark”
• Adaptation to local conditions
• Continuing professional teacher development
• The differences between a “forum” and a “federation” and which body would best suit the Commonwealth context.
• Developing a “formula” for each Member State to move towards increased standardisation.
• Establishing a designation (based on agreed criteria, such as the “Quality Mark” discussed above) for Commonwealth teachers, such as “Commonwealth teacher”.
• A decentralised register to which signatories (i.e. Member States) upload their list of nationally registered teachers that meet the broader criteria of the Commonwealth Forum of Professional Councils.
• A regulating (even gatekeeping) function of national councils that can be greatly enhanced by a Commonwealth-wide approach to professional registration status.

Recommendation 3.5.3:
Establish a Commonwealth Forum of Professional Teacher Councils and other de jure CRAs

This recommendation was advocated at the start of this section and we will not discuss it in great detail here again, except to emphasise that other CRAs that are involved in the professional recognition of foreign teachers in respect of national laws and regulations (such as those within national departments of education) should also be included.

In summary, we recommend that the following principles be kept in mind when considering a forum such as this:

• Member States participate on a voluntary basis.
• Costs of meetings are shared between the Secretariat and Member States.
• A budget is secured by the Secretariat to support the workings of the Forum to enable decisions to be executed in a timely manner.
• At least one annual meeting takes place.
• Core staff members are appointed on a contract/permanent basis to oversee the day-to-day function of the Forum, mainly in an attempt to be a first point of call regarding teacher migration matters in the Commonwealth, but also to manage a decentralised database of teachers.

The main responsibilities of the Forum could include the following:

• Support national teacher professional councils to coordinate teacher provisioning in their respective countries.
• Support Member States that do not have teacher professional councils.
• Develop, in collaboration with national teacher professional councils, a Commonwealth standard for professional registration status.
• Develop and maintain a decentralised registry of teachers that meet the agreed Commonwealth Teacher Professional Registration Standard.
• Clarify and communicate matters pertaining to teacher professional registration status in the Commonwealth.
• Collate and analyse data on teacher migration across the Commonwealth.
• Support teachers to comply with the agreed Commonwealth Teacher Professional Registration Standard, particularly with regard to adaptation to local conditions and CPD.
• Establish a Commonwealth teacher designation that will be recognisable and trusted by employers across Commonwealth Member States.

In conclusion, we have argued that the rights of teachers to migrate internationally can be balanced by the effective functioning of national teacher professional councils, but supported by a Commonwealth Forum of Professional Teacher Councils. This recommendation is similar to the one made for the recognition and transferability of teacher qualifications, i.e. the call for the establishment of a grouping of qualifications authorities. The obvious question is whether both structures are needed, and whether they can be integrated to save costs and duplication. Our view is that the two proposed structures (the Association of Commonwealth Qualifications Authorities, ACQA and Commonwealth Forum of Professional Teacher Councils, CFPTC) are different in composition and purpose and should be kept separate.

The two proposed structures, ACQA CFPTC, are different in composition and purpose and should be kept separate.

We return to this point in the final section of this report, but before doing so we present in the next section an overview of the data collected from the nine countries involved in the pilot study in a manner aligned to the recommendations made in earlier sections.
SECTION 4: COUNTRIES SURVEYED

4.1 Introduction

In this section we present a brief overview of the country data collected in the pilot study that included nine Commonwealth countries: Jamaica, Mauritius, Sri Lanka, Canada, India, South Africa, Australia, England (UK), Northern Ireland. An important point that we need to emphasise here is that the data collected from the nine countries was used only in part to develop the recommendations, as greater emphasis was placed on current best practice and relevant literature.

A questionnaire (see Appendix 1) was constructed, and distributed to the nine Commonwealth member states listed above. However, Canada and India were not able to respond to the questionnaire. In the case of Canada a national response is difficult as “There is no single system for education in Canada. …Each province and territory has its own autonomous education system and thus makes decisions on schools, teachers and curriculum” difficult (www.ctf-ice.ca/en/teaching/teaching.htm, accessed 1 August 2006). In the case of India, the researchers were not able to identify an appropriate respondent.

Appendix 3 provides a synthesised summary of the responses received.

The section is structured as follows:

- Basic country data – an overview of the number of schoolteachers in each of the nine countries.
- Teacher migration – reported migration for the period 2001 to 2005
- Current status of qualifications frameworks – report status of qualifications frameworks
- Teacher qualifications – reported primary and secondary school qualifications in the home country, professional and academic qualifications, cross-country recognition of teacher qualifications, post-school training and school-based probation
- Teacher professional registration status – reported teacher professional registration in home country, continuing professional development, teacher employment, induction programmes and cross-country links between teacher professional councils

The section concludes with a summary of the main observations as they relate to the earlier recommendations on the recognition and transferability of teacher qualifications and teacher professional registration status across the Commonwealth.
4.2 Basic country data

<table>
<thead>
<tr>
<th>Country</th>
<th>Total population (millions)</th>
<th>Number of schoolteachers (thousands)</th>
<th>Total number of new teachers required by 2015</th>
<th>Reference year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jamaica</td>
<td>2.6</td>
<td>12.0 12.8 24.9</td>
<td>6.7</td>
<td>2004</td>
</tr>
<tr>
<td>Mauritius</td>
<td>1.2</td>
<td>5.3 7.4 12.8</td>
<td>3.5</td>
<td>2005</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>19.2</td>
<td>71.7 119.5 191.2</td>
<td>45.7</td>
<td>2004</td>
</tr>
<tr>
<td>Canada</td>
<td>31.6</td>
<td>141.1 147.9 289.0</td>
<td>–</td>
<td>2001</td>
</tr>
<tr>
<td>India</td>
<td>1064.4</td>
<td>3 387.9 2 586.2 5 974.1</td>
<td>2 108.8</td>
<td>2004</td>
</tr>
<tr>
<td>South Africa</td>
<td>45.8</td>
<td>221.0 149.1 367.0</td>
<td>–</td>
<td>2003</td>
</tr>
<tr>
<td>Australia</td>
<td>19.8</td>
<td>249.6 – –</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>England (UK)</td>
<td>59.3</td>
<td>259.0 372.9 631.9</td>
<td>152.1</td>
<td>2004</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>1.7</td>
<td>8.4 11.0 19.1</td>
<td>–</td>
<td>–</td>
</tr>
</tbody>
</table>

Table 3: Basic country data (schoolteachers)

The following observations are made from the table above:

- Compared to the other eight countries included in this study, India is by far the largest, and will need an enormous number of new teachers (over 2 million) by 2015.
- Most countries, both developed and developing, seem to be heading towards significant shortages of teachers by 2015.

4.3 Teacher migration

For the pilot project the plan was to investigate only particular directions of migration. Three of the countries (Jamaica, Mauritius, Sri Lanka) were designated “source” countries, three (Australia, England (UK), Northern Ireland) were designated “recruiting” countries, and three (Canada, India, South Africa) were designated “node” countries – both “source” and “recruiting” countries. In retrospect, this design led to difficulties. In their responses a number of the countries commented on this matter – data on particular directions of migration are not readily available, and to restrict the response in this way was inhibiting.

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*For the projected number of teachers: the total number of new teachers needed between 2004 and 2015 to meet attrition (medium scenario of 6.5%), and the increased demand implied by UPE goals.

We are indebted to Albert Motivans (of UNESCO UIS) for assistance in compiling this table.
Contrary to the researchers’ plans:

- The response from Jamaica was completed as if England (rather than Canada) was the recruiting country;
- The response from Mauritius was completed as if Mauritius was a recruiting rather than a source country – recruiting teachers from India; and
- The response from Sri Lanka was completed as if Sri Lanka recruits teachers from Canada and is a source country for teachers recruited by Australia.

One thing that this does signal is that the international migration of teachers is multidirectional, and that systems for monitoring migration flows are not well established.

Although it was not part of the purpose of this project, the questionnaire required respondents to indicate roughly the number of teacher migrants over the past five years (2001–2005) in the indicated directions of flow. As can be seen from the table below, the indicated migration flows were minor in most cases. The exceptions are the flow of teachers from Jamaica to England and from South Africa to Australia. Interestingly, South Africa reported that fewer than 20 teachers migrated to Australia (in the five year period) but Australia reported that between 251 and 500 teachers migrated from South Africa to Australia in the same period.

<table>
<thead>
<tr>
<th>Country</th>
<th>Reported migration for the period 2001 to 2005</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Country migrated to</td>
</tr>
<tr>
<td>Jamaica</td>
<td>England</td>
</tr>
<tr>
<td>Mauritius</td>
<td>–</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>India</td>
</tr>
<tr>
<td>South Africa</td>
<td>Australia</td>
</tr>
<tr>
<td>Australia</td>
<td>–</td>
</tr>
<tr>
<td>England (UK)</td>
<td>–</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>–</td>
</tr>
</tbody>
</table>

Table 4: Reported migration of teachers

4.4 Current status of the development of NQFs

As can be seen from the table below the seven countries for which there were responses to the questionnaire indicated that they have “established” National Qualifications Frameworks, and in the case of South Africa there is a reference to the development of a (SADC) Regional Qualifications Framework. There is also some indication of the ways in which teacher qualifications will articulate with these qualifications frameworks9.

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9 Also see a recent paper by Mike Coles (2006) for a comprehensive list of countries developing qualifications frameworks.
<table>
<thead>
<tr>
<th>Country</th>
<th>Reported status of qualifications framework</th>
<th>Additional information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jamaica</td>
<td>Established NQF</td>
<td>Teacher qualifications conform and articulate with the NQF</td>
</tr>
<tr>
<td>Mauritius</td>
<td>Developing a comprehensive NQF (since 2002)</td>
<td>10 levels</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>Discussions about a NQF for higher education</td>
<td>6 levels</td>
</tr>
<tr>
<td>Canada</td>
<td>–</td>
<td>Early discussions on NQF</td>
</tr>
<tr>
<td>India</td>
<td>–</td>
<td>Details not known</td>
</tr>
<tr>
<td>South Africa</td>
<td>Comprehensive NQF – under review</td>
<td>8 levels defined in terms of learning outcomes (current proposal to change to 10 levels)</td>
</tr>
<tr>
<td>Australia</td>
<td>Comprehensive NQF based on reference qualifications</td>
<td>Effectively 11 levels. Teacher qualifications at the tertiary level of the NQF.</td>
</tr>
<tr>
<td>England (UK)</td>
<td>Established NQF</td>
<td>Based on 8 levels (+ an entry level) and learning outcomes (credit transfer system under development)</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 5: Status of NQF developments

4.5 Teacher qualifications

Five of the seven countries (Sri Lanka, South Africa, Australia, England (UK), Northern Ireland) from which responses were received, report that there is no difference between the basic minimum teacher qualification required for primary and secondary teachers.

The following three countries require different qualifications for primary and secondary teachers:

- Jamaica requires better CSec passes for admission to training as a secondary teacher.
- Mauritius requires a two-year post school Teachers’ Diploma for primary teaching, and a Degree – but with no “professional” qualification (such as a PGCE) – for secondary teaching.
- India requires either two years of post-school training or a Degree (Bachelor of Elementary Education or a degree plus a BEd) for primary teaching, and either a Bachelor or a Master’s Degree in a relevant subject for secondary teaching.
## Table 6: Primary school teacher qualifications in home country

<table>
<thead>
<tr>
<th>Country</th>
<th>Admission to initial qualification</th>
<th>Basic minimum initial teacher qualifications</th>
<th>Number of post-school years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jamaica</td>
<td>5 CSec passes</td>
<td>Diploma in Teaching</td>
<td>3</td>
</tr>
<tr>
<td>Mauritius</td>
<td>A level</td>
<td>Teachers’ Diploma</td>
<td>2</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>GCE (A/L)</td>
<td>Graduate from University or National College of Education</td>
<td>–</td>
</tr>
<tr>
<td>Canada</td>
<td>Grade 12</td>
<td>University qualification</td>
<td>4</td>
</tr>
<tr>
<td>India</td>
<td>Senior Secondary School Certificate</td>
<td>2 years basic teachers’ training Bachelor of Elementary Education (B El Ed)</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Graduate + BEd</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>South Africa</td>
<td>Senior Certificate with Matriculation Exemption Or an approved 3-year Bachelor degree</td>
<td>BEd Degree and PGCE</td>
<td>4</td>
</tr>
<tr>
<td>Australia</td>
<td>Year 12 certificate above a designated cut off</td>
<td>BEd Bachelor degree plus Diploma in Education</td>
<td>4</td>
</tr>
<tr>
<td>England (UK)</td>
<td>Grade C at GCSE in English and Maths and a science subject</td>
<td>A degree or equivalent</td>
<td>4</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>Grade C at GCSE in English and Maths and a science subject</td>
<td>BEd Degree and PGCE</td>
<td>4</td>
</tr>
</tbody>
</table>
### Table 7: Secondary school teacher qualifications in home country

#### Professional and academic qualifications

Question 17 was, perhaps, poorly formulated: ‘Does your country distinguish between professional and academic qualifications in the field of education?’ The question assumes that “the field of education” includes more than “teacher education”, and this is probably not clear.

The purpose of this question was to find out the extent to which qualifications other than the basic qualifications required for teaching, particularly research degrees in the field of education, might be relevant in the employment status of recruited teachers. Underlying this question is a distinction between professional qualifications, which are intended to contribute directly to the improvement of the professional competence of teachers, and academic qualifications leading towards research in the field of education.

Three of the countries (Australia, England and Northern Ireland) report that no distinction is made between professional and academic qualifications in the field of education, and those that did respond to this question seem to make the distinction in an understandable way. But, as pointed out above, “the field of education” might have been understood to be synonymous with “teacher education.”

---

<table>
<thead>
<tr>
<th>Country</th>
<th>Admission to initial qualification</th>
<th>Basic minimum initial teacher qualifications</th>
<th>Number of post-school years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jamaica</td>
<td>CSec passes</td>
<td>Diploma in Teaching</td>
<td>3</td>
</tr>
<tr>
<td>Mauritius</td>
<td>GCE A Level</td>
<td>Degree</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No professional qualification needed</td>
<td></td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>GCE (A/L)</td>
<td>Graduate from University or National College of Education</td>
<td>–</td>
</tr>
<tr>
<td>Canada</td>
<td>Grade 12</td>
<td>University qualification</td>
<td>4</td>
</tr>
<tr>
<td>India</td>
<td>Senior Secondary School Certificate</td>
<td>Graduate + BEd Integrated BSc Master’s degree in relevant subject + BEd Integrated MSc Ed</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Africa</td>
<td>Senior Certificate with Matriculation Exemption Or an approved 3-year Bachelor degree</td>
<td>BEd Degree and PGCE</td>
<td>4</td>
</tr>
<tr>
<td>Australia</td>
<td>Year 12 certificate above a designated cut off</td>
<td>BEd Bachelor degree plus Diploma in Education</td>
<td>4</td>
</tr>
<tr>
<td>England (UK)</td>
<td>Grade C at GCSE in English and Maths and a science subject</td>
<td>A degree or equivalent</td>
<td>4</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>Grade C at GCSE in English and Maths and a science subject</td>
<td>BEd Degree and PGCE</td>
<td>4</td>
</tr>
</tbody>
</table>

---


13 For India data drawn from Gazette #238 of 4 September 2001
Table 8: Professional and academic teacher qualifications

Cross-country recognition of teacher qualifications

Despite the fact that the cross-country recognition of teacher qualifications is at the heart of this project, the responses to the questions about this matter (questions 22–32 on the questionnaire) were not very illuminating. Only England noted there is no (automatic) recognition of teacher qualifications from India; and only Mauritius noted a formal cross-country agreement (with India) about the recognition of basic teacher qualifications.
Table 9: Cross-country recognition of teacher qualifications

Post-school training

Five (Canada, South Africa, Australia, England (UK), Northern Ireland) of the nine countries surveyed require four years of post school training as the basic minimum teacher qualification, with – apart from Canada, in the case of which this detail is not available – the general pattern being either a dedicated professional degree (such as a BEd) or another appropriate first degree and a Post Graduate Certificate in Education.

As reported, the following countries differ from this pattern:

- In Jamaica the Diploma in Teaching requires three years of post secondary school study.
- In Mauritius the Primary Teachers’ Diploma requires two years of post secondary school study.
- In India primary teachers require two years of post secondary school basic training, while secondary teachers require four years.
- The number of years of post school study required in Sri Lanka is unclear from the information provided.

School-based probation

Six of the seven countries that responded to the questionnaire (the exception was Northern Ireland) reported that school-based probation was required after the achievement of the basic qualification. Three countries (Jamaica, Sri Lanka and Australia) require six months of probation, and three (Mauritius, South Africa and England) require one year of probation.

Only South Africa and England reported requirements in addition to a basic qualification for recognition for employment in a public school. In the case of South Africa, the additional requirement is registration with the Professional Council (SACE); in the case of England the additional requirements are “Qualified Teacher Status” (QTS) and registration with the Professional Council (GTCE). QTS is recommended by an examining body but issued by the GTCE.

In addition, the response for England mentioned that there are other requirements for recognition for employment in a public school:

- Physical fitness requirements;
- basic skills test in English, Maths and Science;
- able to use ICT as a teaching aid;
- no criminal background that might make them unsuitable to work with children.
Additional requirements such as these are likely to be required in other countries, but were simply not noted in the responses to the questionnaire.

4.6 Teacher professional registration

Of the nine countries, six have professional teachers councils. Sri Lanka and Mauritius reported that there was no Professional Council:

- Jamaica – Jamaica Teachers’ Association (JTA)
- South Africa – South African Council for Educators (SACE)
- Australia – Australian Joint Council of Professional Teaching Associations (AJPCTA)
- England – General Teaching Council for England (GTCE)
- Northern Ireland – General Teaching Council for Northern Ireland (GTCNI)
- Canada – Canadian Teachers’ Federation (CTF)
- India – National Council for Teacher Education (India)

In those cases reported, professional registration requires the basic teacher qualification and in some cases something in addition – such as a medical certificate. Three of the countries (Jamaica, South Africa and Australia) reported that registration with the Professional Council is required for employment in a public school.

The six countries that reported having Professional Councils (the information for India was based on another source) also noted that professional registration could be withdrawn, typically for professional misconduct or contravening professional responsibilities or a Code of Conduct.
### Professional registration

<table>
<thead>
<tr>
<th>Country</th>
<th>Professional council</th>
<th>Registration with Council required for employment</th>
<th>Requirements for Professional registration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jamaica</td>
<td>Yes</td>
<td>Yes</td>
<td>Medical certificate, Two character references, Evidence of qualification, Birth and marriage Certificate, Tax number, National insurance number</td>
</tr>
<tr>
<td>Mauritius</td>
<td>No</td>
<td>No</td>
<td>Registration is more administrative than professional</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>No</td>
<td>No</td>
<td>–</td>
</tr>
<tr>
<td>Canada</td>
<td>Yes</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>India</td>
<td>–</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>South Africa</td>
<td>Yes</td>
<td>Yes</td>
<td>At least 3 years of post secondary professional training</td>
</tr>
<tr>
<td>Australia</td>
<td>Yes</td>
<td>Yes</td>
<td>Basic qualification Conditional registration available after 3 years of training</td>
</tr>
<tr>
<td>England (UK)</td>
<td>Yes</td>
<td></td>
<td>Being recommended for QTS (by an examining body) Provisional registration will soon be available for those working towards QTS</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>Yes</td>
<td>No</td>
<td>–</td>
</tr>
</tbody>
</table>

**Table 10: Teacher professional registration in home country**

**Continuing professional development**

Questions 15 to 17 on the questionnaire were designed to find out what initial education qualifications other than the basic minimum qualifications are available to teachers. Both Jamaica and Mauritius reported having qualifications that can take teachers with the basic qualification to further levels.

Question 16 asked for information about formal qualifications in the field of continuing professional development. There is widespread agreement that continuing professional development is becoming increasingly important but, as the responses indicate, not all agree that it needs to involve formal qualifications.

In the cases of Jamaica and Mauritius, again, responses indicate that higher degrees are understood as continuing professional development. By contrast, in the case of South Africa the two qualifications mentioned in this category are specially designed to “upgrade” the qualifications of teachers with qualifications from the past; they are not higher degrees. Interestingly, both England and Northern Ireland do not mention formal qualifications for continuing professional development.
Additional requirements such as these are likely to be required in other countries, but were simply not noted in the responses to the questionnaire.

### 4.6 Teacher professional registration

Of the nine countries, six have professional teachers councils. Sri Lanka and Mauritius reported that there was no Professional Council:

- Jamaica – Jamaica Teachers’ Association (JTA)
- South Africa – South African Council for Educators (SACE)
- Australia – Australian Joint Council of Professional Teaching Associations (AJCPTA)
- England – General Teaching Council for England (GTCE)
- Northern Ireland – General Teaching Council for Northern Ireland (GTCNI)
- Canada – Canadian Teachers’ Federation (CTF)
- India – National Council for Teacher Education (India)

In those cases reported, professional registration requires the basic teacher qualification and in some cases something in addition – such as a medical certificate. Three of the countries (Jamaica, South Africa and Australia) reported that registration with the Professional Council is required for employment in a public school.

The six countries that reported having Professional Councils (the information for India was based on another source) also noted that professional registration could be withdrawn, typically for professional misconduct or contravening professional responsibilities or a Code of Conduct.
Data on the cross-country recognition of teacher qualifications was disappointingly limited. It was, however, clear that virtually no formal agreements exist between the nine countries.

The general pattern for minimum teacher qualifications amongst the nine countries is either a dedicated professional degree (such as a BEd) or another appropriate first degree and a Post Graduate Certificate in Education.

Most of the countries (six of the seven) reported that school-based probation was required after the achievement of the basic qualification.

Only South Africa and England reported requirements in addition to a basic qualification for recognition for employment in a public school.

Of the nine countries, six have professional teachers councils.

There is widespread agreement that continuing professional development is becoming increasingly important but not all agree that it needs to involve formal qualifications.

Responses to cross-country recognition for employment at the same level in a public school were mixed.

Only three (Mauritius, Australia and England) of the six recruiting countries reported that they offered induction programmes.

No formal cross-country links between teacher professional councils, or formal recognition agreements about cross-country professional registration were reported.
SECTION 5: SUMMARY OF RECOMMENDATIONS AND CONCLUDING COMMENTS

5.1 Summary

The main aim of this research project was to investigate the recognition and transferability of teacher qualifications and professional registration status across Commonwealth countries, with a view to developing systems and criteria to assess the equivalence of such qualifications and professional status across the Commonwealth that would advance the purpose of the Protocol for the Recruitment of Commonwealth Teachers.

The research has been underpinned by a number of key principles, such as:

- The migration of highly skilled workers is a global phenomenon that is unlikely to slow down.
- National and regional qualifications frameworks improve the recognition and transferability of teacher qualifications, and therefore also facilitate migration.
- Comparability of qualifications and equivalence of qualifications are different processes, conducted by different agencies, and for different purposes.
- International comparability of qualifications is a viable and effective way in which the recognition and transferability of teacher qualifications can be improved.
- Professional registration of teachers offers an avenue through which teachers’ professional status can be internationally benchmarked, which, in turn, leads to improved recognition and transferability of teacher professional registration status.
- Professional registration of teachers can control teacher migration for the benefit of both the individual teacher and the receiving country.
- Employment status of a teacher is dependent on both (a) the recognition and transferability of qualifications, and (b) professional status.
- The employment status of a teacher in a country other than his/her own should be similar to the employment status in his/her own country.

The importance to balance (a) the rights of teachers to migrate internationally, as facilitated by national and regional qualifications frameworks, against (b) the need to protect the integrity of national education systems, as enabled by employing effective professional registration systems has also been an important thread that has run throughout this report, as illustrated in the diagram on the right.

Furthermore, the recommendations offered in this report, are reliant on a common understanding of the roles and responsibilities of a variety of bodies, some located in the domain of qualifications, and others in the domain of professional councils. While these roles and responsibilities are located in the separate “domains”, it is evident that the recognition of qualifications, particularly the determination of equivalency, and the recognition of professional registration status are not mutually exclusive processes. On the contrary, the two processes are interwoven, with professional recognition heavily dependent on the recognition of qualifications. The following diagram further explains the interrelatedness of the recognition of qualifications and professional registration status.
Diagram 7: Recognition of qualifications and professional status in the Commonwealth

This diagram summarises the roles and responsibilities of the various bodies involved in both the recognition of qualifications and professional registration status. The following points are important in this regard:

- CRAs, particularly the de jure professional CRAs, play an important role in both the recognition of qualifications (they determine equivalence) and professional registration status (here they determine national benchmarks).
- NICs have national responsibility for determining comparability of qualifications that also informs the benchmarking of professional registration status.
- Qualifications authorities (or agencies) are responsible for national standard setting and quality assurance processes and the development and implementation of NQFs. This work is directly related to both the recognition of qualifications and professional registration status as the framework provides a common frame of reference and approach to qualifications design.
- On a regional and/or cross-country level some progress has been made toward increased coordination for comparability and equivalency of qualifications. Examples include regional initiatives by independent agencies (such as the OECD’s ISCED framework and the UK Credit Equivalence Project’s approach to determining equivalency) as well as initiatives by formal regional associations (such as the Commonwealth’s review of the promises and problems with NQFs, the European Union’s “meta” qualifications framework and SADC’s regional qualifications framework).
- In this report we suggest that an earlier call for the establishment of a formal grouping of qualifications authorities in the Commonwealth is revisited. We concur that an Association of Commonwealth Qualifications Authorities (ACQA) will be the most appropriate body to utilise the advantages of existing and new national and regional qualifications frameworks, tap into the progress made by other independent agencies and formal regional associations, and in so doing, to facilitate the improved recognition of teacher qualifications across Commonwealth Member States.
- In this report we further suggest that a “Commonwealth Forum of Professional Teacher Councils” (CFPTC) is needed to determine cross-country benchmarks for teacher professional registration status. This will include
utilising current cross-country collaborations between teacher councils, professional bodies and also teacher unions and the development of a Commonwealth standard for professional registration status.

- While we have not attempted to recommend the location of the two proposed bodies in great detail, we suggest that the following be considered:
  
  o The two bodies are different in purpose and design and should not be integrated; even so, close collaboration between the two bodies will be important and necessary.
  o ACQA and CFPTC require, at least to some extent, formal recognition and appointment from the Commonwealth Secretariat.
  o In both cases, participation in the workings of the two bodies should be voluntary. The recommendations and guidelines developed by the two bodies should also not be prescriptive or compulsory.
  o ACQA could be modelled on SADC’s Technical Committee on Certification and Accreditation, which includes qualifications authorities and agencies in the SADC region and has a very similar purpose.
  o CFPTC could be included in the structures of the Commonwealth Teachers Grouping (CTG) if appropriate and feasible.

The table below summarises the various aspects of the recognition of teacher qualifications and professional registration status:

<table>
<thead>
<tr>
<th>Aspect</th>
<th>Recognition of teacher qualifications</th>
<th>Recognition of teacher professional registration status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scope</strong></td>
<td>Comparability (the extent to which qualifications are found to be comparable based on an analysis of their specifications)</td>
<td>Benchmarking (the extent to which teacher professional bodies and councils align their standards for teacher education and professional practice against generally accepted standards for effective and committed teaching)</td>
</tr>
<tr>
<td><strong>Purpose</strong></td>
<td>Academic recognition, mainly for further studies, but is directly related to professional status and employment</td>
<td>Professional recognition, mainly for employment purposes</td>
</tr>
<tr>
<td><strong>Result</strong></td>
<td>Enables teachers to migrate internationally</td>
<td>Protects the integrity of national education systems</td>
</tr>
<tr>
<td><strong>Jurisdiction</strong></td>
<td>Regulated by international conventions, bilateral and multilateral agreements and cooperation programmes on institutional level</td>
<td>Regulated by national legislation, regional directives, agreements which are adopted internationally be professional bodies</td>
</tr>
<tr>
<td><strong>Responsible bodies on national level</strong></td>
<td>Carried out by academic CRAs as advised by the NIC, and as supported by the work of qualifications authorities and agencies</td>
<td>Carried out by professional CRAs [employers (non-regulated professions) and professional or government bodies (regulated professions)] as advised by the NIC and other academic CRAs</td>
</tr>
<tr>
<td><strong>Proposed responsible body for on regionally/cross-countries level</strong></td>
<td>Association of Commonwealth Qualifications Authorities (ACQA)</td>
<td>Commonwealth Forum of Professional Teacher Councils (CFPTC)</td>
</tr>
</tbody>
</table>

*Table 11: Recognition of teacher qualifications and teacher professional status in the Commonwealth (Based in part on SAQA, 2005:6)*
5.2 Recommendations to the Working Group on Teacher Qualifications

The following recommendations are offered for consideration by the Working Group on Teacher Qualifications for coordinating the recognition and transferability of qualifications in the Commonwealth through qualifications frameworks:

**Recommendation 2.5.1: Utilise the advantages of national and regional qualifications frameworks**

Many Commonwealth Member States have NQFs, or are considering NQFs. Even those Member States that do not fit into either of these categories have some form of quality assurance system. In addition, three emerging regional qualifications frameworks cover Member States. While it has been pointed out that qualifications frameworks are not without problems, and probably still need to fulfil many of the promises associated with them, it has also been clearly shown that they offer many advantages for the recognition of qualifications.

**Recommendation 2.5.2: Develop a qualifications comparability matrix**

In our view, a benchmarking exercise is needed to determine the comparability of teacher qualifications across Member States. As suggested earlier in this section, such an exercise should be based on a similar exercise undertaken through the UK Credit Equivalence project, but be customised to look at comparability rather than equivalence. As also mentioned on a number of previous occasions, we are of the view that equivalence is not what is required in order to determine (and improve) the recognition of teacher qualifications across Commonwealth Member States, but that comparability offers a more pragmatic and attainable option that is also better suited to harness the advantages of existing national and regional qualifications frameworks that can be overseen by the Commonwealth Secretariat.

**Recommendation 2.5.3: Establish a formal grouping of qualifications authorities**

We recommend that an earlier suggestion for the establishment of an Association of Commonwealth Qualifications Authorities (ACQA) be revisited. Suggested responsibilities for ACQA include:
• Development of a Commonwealth qualifications database (flexible, electronic, web-based, easy to update) for teacher qualifications, including data on distance and open learning.\textsuperscript{14}
• Clarification and communication of qualifications-related terminologies, such as qualification, equivalence, credit and credit equivalence, comparability, level descriptors, credits, and so on.
• Considerations for including key stakeholders, including recognised awarding bodies in Member States
• Development of criteria for the registration and accreditation of private institutions (this work can be based on progress already made in SADC, EU, Caribbean, etc.) and generally improving the quality and legitimacy of providers.
• Investigation into, and possible agreement on, the number of levels and the development of generic/common level descriptors for a Commonwealth meta-framework.
• Oversight, facilitation and conduct of capacity building in Member States that request it, which will in turn lead to the fast-tracking of the development and implementation of NQFs in Member States, including the establishment of national qualifications authorities.

5.3 Recommendations to the Working Group on Teacher Professional Registration

The following recommendations are put forward for consideration by the Working Group on Teacher Professional Registration for coordinating the recognition and transferability of teacher professional registration status in the Commonwealth:

Recommendation 3.5.1: Foster cross-country links between teacher professional councils

Existing links between national teacher professional councils should be further developed across the Commonwealth. Countries without teacher professional councils should be encouraged to establish such bodies, and where this may be difficult, to actively participate in the development of a Commonwealth standard for teacher professional registration.

Recommendation 3.5.2: Reinforce the professional status of teachers by developing a Commonwealth standard for professional registration status

As discussed at length in this report, the need to improve the professional status of teachers is a global problem that requires a well-coordinated and holistic approach. It is our view, based on the evidence presented in this report that the benchmarking of teacher professional status in the Commonwealth should be based on, among others, the following criteria:

• Development and agreement on a “Quality Mark”
• Adaptation to local conditions
• Continuing professional teacher development
• The differences between a “forum” and a “federation” and which body would best suit the Commonwealth context
• Developing a “formula” for each Member State to move towards increased standardisation
• Establishing a designation (based on agreed criteria, such as the “Quality Mark” discussed above) for Commonwealth teachers, such as “Commonwealth teacher”
• A decentralised register to which signatories (i.e. Member States) upload their list of nationally registered teachers that meet the broader criteria of the Commonwealth Forum of Professional Councils
• A regulating (even gatekeeping) function of national councils that can be greatly enhanced by a Commonwealth-wide approach to professional registration status.

\textsuperscript{14} This database on teacher qualifications could form the basis for a more extensive database including other sectors as well.
\textsuperscript{15} See Section 2.4 for a detailed discussion on the role and function of a CRA.
Recommendation 3.5.3: Establish a Commonwealth Forum of Professional Teacher Councils and other de jure Competent Recognition Authorities (CRAs)

The main responsibilities of the Forum will include the following:

- Support national teacher professional councils to coordinate teacher provisioning in their respective countries.
- Support Member States that do not have teacher professional councils.
- Develop, in collaboration with national teacher professional councils, a Commonwealth standard for professional registration status.
- Develop and maintain a decentralised registry of teachers that meet the agreed Commonwealth Teacher Professional Registration Standard.
- Clarify and communicate matters pertaining to teacher professional registration status in the Commonwealth.
- Collate and analyse data on teacher migration across the Commonwealth.
- Support teachers to comply with the agreed Commonwealth Teacher Professional Registration Standard, particularly with regard to adaptation to local conditions and CPD.
- Establish a Commonwealth teacher designation that will be recognisable and trusted by employers across Commonwealth Member States.

5.4 Concluding comments

It is our view, based on the evidence presented in this report, that up to recently, the emphasis in teacher education has been on improved recognition and transferability of qualifications, while the recognition and transferability of professional registration status has lagged behind, leading to an imbalance that requires urgent attention. It is for this reason that we have tried to present a detailed and substantial case for the establishment of two bodies that will respectively be responsible for the harmonisation of teacher qualifications and benchmarking of teacher professional status. Our recommendations have not been made without a thorough and careful consideration of feasible alternatives, and a realisation of the resource and logistical implications associated with establishing two separate bodies. As mentioned earlier in this report, we are of the opinion that the two proposed bodies (the Association of Commonwealth Qualifications Authorities, ACQA and Commonwealth Forum of Professional Teacher Councils, CFPTC) are different in structure and purpose and should be kept separate.

These recommendations present the most appropriate long-term solution to the recognition and transferability of teacher qualifications and teacher professional status. The recommendations are not necessarily the most cost effective option, nor will they necessarily provide the quick wins that may be required. We acknowledge that our recommendations are ambitious and will require difficult decisions to be made. We look forward to presenting our case to the Working Committee on Teacher Qualifications at its meeting in Pretoria, South Africa on 28 and 29 September 2006 and the actions that will follow thereafter.

The South African Qualifications Authority
September 2006
The Recognition of Teacher Qualifications across nine Commonwealth Member States

Mauritius
South Africa
Australia
Sri Lanka
India
England
Jamaica
Canada
Northern Ireland

A research project commissioned by the Commonwealth Secretariat
14 March 2006

To whom it may concern

The Commonwealth Secretariat has commissioned the South African Qualifications Authority (SAQA) to lead and coordinate research on the recognition of teacher qualifications and professional registration across Commonwealth Member States. The research will be conducted between January 2006 and 30 September 2006 and will focus in particular on Africa, the Caribbean, Canada, Asia, Europe and the Pacific.

Your cooperation in making this research a success will be greatly appreciated.

If you need any further clarification on the research you can contact the South African Qualifications Authority:

Contact person: James Keevy
Email: jkeevy@saqa.co.za
Telephone: +27 12 431 5033

If for any reason you need to contact the Commonwealth Secretariat you can do so using the following:

Contact person: Roli Degazon-Johnson
Email: R.Degazon-Johnson@commonwealth.int
Telephone: +44 (0) 20 7747 6289

Yours sincerely

Dr Henry Kaluba
Deputy Director and Head of Education
**Introduction**

Teacher loss has become a major concern in many countries across the world. The increasing international migration of skilled professional teachers is aggravating this situation, particularly for smaller countries trying to maintain national schooling systems, and striving to reach the goals of Universal Primary Education by 2015. At the same time it is acknowledged that international teacher migration can benefit schooling systems and be a significant contributor to the professional development of teachers.

In September 2004 the Ministers of Education of the Commonwealth countries formally adopted a *Protocol for the recruitment of Commonwealth teachers*. This Protocol “aims to balance the rights of teachers to migrate internationally against the need to protect the integrity of national education systems”. The Education Ministers requested the Commonwealth Secretariat to establish a Working Group to investigate various dimensions of teacher migrations across Commonwealth countries. A number of projects have been set up, and the current project, of which this Questionnaire is a key part, is one of these projects.

The main aim of this project is to investigate the recognition and transferability of schoolteacher qualifications and professional registration status across Commonwealth countries, with a view to developing systems and criteria to assess the equivalence of such qualifications and professional registration across the Commonwealth.

The project is being undertaken in two phases – Phase 1 investigates the situation in nine countries and teacher migration between them (Mauritius–South Africa–Australia, Sri Lanka–India–England, and Jamaica–Canada–Northern Ireland). Phase 2 will extend the investigation to cover all Commonwealth countries. One of the purposes of Phase 1 is to refine the tools to be used in Phase 2, and Section F of the Questionnaire invites you to make suggestions in this regard.

The following are the principal researchers; please feel free to contact them if you need to:

<table>
<thead>
<tr>
<th>Professor Wally Morrow (Lead Researcher)</th>
<th>Dr James Keevy (Researcher)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone: +2741 583 1120</td>
<td>Telephone: +2712 431 5033</td>
</tr>
<tr>
<td>Mobile: +2783 389 2132</td>
<td>Fax: +2712 431 5147</td>
</tr>
<tr>
<td>Email: <a href="mailto:morrow@netactive.co.za">morrow@netactive.co.za</a></td>
<td>Email: <a href="mailto:jkeevy@saqa.co.za">jkeevy@saqa.co.za</a></td>
</tr>
</tbody>
</table>

Please return the Questionnaire by the due date – **Friday 7 July 2006** – to Wally Morrow and James Keevy at the email addresses above.

**Instructions**

Phase 1 of this project must be completed speedily – in time to meet the agenda deadlines for the upcoming meeting of the Commonwealth Ministers of Education (16th CCEM).

This Questionnaire is not a mass survey – only a single representative of each of the nine countries will complete it.

a. This is an electronic questionnaire. You can complete fields by clicking on the drop-down lists or typing your response in the field provided. **Please save the completed questionnaire to your hard drive before attaching it to a return email.**

b. Please make sure to complete the information requested on the Information Sheet (p 5). The purpose of this is to enable the researchers to make contact with you should something be unclear, or to enrich our understanding of the data you provide.

---

18 Education for All Commitments – Dakar 2000
c A list of Definitions is provided on p 6. Please read them carefully before you respond to the Questionnaire to ensure a common interpretation of terminology. Please indicate any concerns or possible misunderstandings where appropriate. One of the hazards in an investigation of this kind is difference in the usages of some of the key terminology.

d At the start of the Questionnaire you are asked to indicate whether you are responding as the representative of a Source Country, a Recruiting Country or (in the cases of South Africa, India and Canada) as both. For the purposes of this Phase of the project, the Source Countries and Recruiting Countries are as follows:

e The current Phase of the project focuses on particular directions of teacher migrations (for instance from Jamaica (Source Country) only to Canada (Recruiting Country)); please keep this in mind as you complete the Questionnaire.

f Please respond to all the items on the Questionnaire, in the light of the best data available to you. Use a question mark (?) in cases where you provide what is only an informed estimate or you are expressing a view that might be contested.

Section E of the Questionnaire asks you to refer the researchers to relevant official documents in the case of the matters being investigated here. Please do so, preferably with electronic (Internet) addresses. Feel free to expand on any of the items – on additional sheets, if needed.
### INFORMATION ABOUT PERSON COMPLETING THIS QUESTIONNAIRE

<table>
<thead>
<tr>
<th>Country</th>
<th>If other, please specify:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organisation or Government Department</td>
<td></td>
</tr>
<tr>
<td>Your position in that Organisation</td>
<td></td>
</tr>
<tr>
<td>Your name</td>
<td></td>
</tr>
<tr>
<td>Postal Address</td>
<td></td>
</tr>
<tr>
<td>Telephone – Fixed line</td>
<td></td>
</tr>
<tr>
<td>Telephone – Mobile</td>
<td></td>
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<tr>
<td>Fax</td>
<td></td>
</tr>
<tr>
<td>Email(1)</td>
<td></td>
</tr>
<tr>
<td>Email(2)</td>
<td></td>
</tr>
</tbody>
</table>

Other possible contacts in your country? If you know of other persons who have particular knowledge about teacher migration, teacher qualifications, and the employment status of migrating teachers, please list them below.

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
<th>Telephone</th>
<th>Email</th>
<th>Particular expertise</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
<th>Telephone</th>
<th>Email</th>
<th>Particular expertise</th>
</tr>
</thead>
</table>
## SECTION A – BASIC INFORMATION

### Source Countries
- Mauritius
- Sri Lanka
- Jamaica

### Recruiting and Source Countries
- South Africa
- India
- Canada

### Recruiting Countries
- Australia
- England
- Northern Ireland

<table>
<thead>
<tr>
<th></th>
<th>Name of your Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Source or Recruiting Country</td>
</tr>
<tr>
<td>3</td>
<td>Please indicate the relevant Source Country from which your country receives teachers, if any (see the diagram above).</td>
</tr>
<tr>
<td>4</td>
<td>Please indicate the relevant Recruiting Country to which your country provides teachers, if any (see the diagram above).</td>
</tr>
<tr>
<td>5</td>
<td>How many teachers migrated from your country to the Recruiting Country during the five years from 2001 to 2005?</td>
</tr>
<tr>
<td>6</td>
<td>How many teachers migrated from the Source Country to your country during the five years from 2001 to 2005?</td>
</tr>
</tbody>
</table>

In Section E below, please provide information about any bilateral agreements related to teacher migrations between the Source Country and the Recruiting Country.
# SECTION B – TEACHER QUALIFICATIONS

## TEACHER QUALIFICATIONS IN COUNTRY

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>For <strong>Primary School</strong> Teachers:</td>
<td></td>
</tr>
<tr>
<td>7. What is the basic minimum initial teacher qualification in your country?</td>
<td></td>
</tr>
<tr>
<td>8. What are the admission requirements for a programme leading to this qualification?</td>
<td></td>
</tr>
<tr>
<td>9. How many post-school years (minimum) does it take to achieve this qualification?</td>
<td></td>
</tr>
<tr>
<td>10. Which authority issues the basic qualification?</td>
<td></td>
</tr>
<tr>
<td>For <strong>Secondary School</strong> Teachers:</td>
<td></td>
</tr>
<tr>
<td>11. What is the basic minimum initial teacher qualification in your country?</td>
<td></td>
</tr>
<tr>
<td>12. What are the admission requirements for a programme leading to this qualification?</td>
<td></td>
</tr>
<tr>
<td>13. How many post-school years (minimum) does it take to achieve this qualification?</td>
<td></td>
</tr>
<tr>
<td>14. Which authority issues the basic qualification?</td>
<td></td>
</tr>
<tr>
<td>For <strong>All</strong> Teachers:</td>
<td></td>
</tr>
<tr>
<td>15. What other initial teacher qualifications are available?</td>
<td></td>
</tr>
<tr>
<td>16. What qualifications are there for ongoing professional development of teachers?</td>
<td></td>
</tr>
<tr>
<td>17. Does your country distinguish between professional and academic qualifications in the field of education? (If so, indicate these in the table below)</td>
<td>YES NO</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Professional qualifications</th>
<th>Academic qualifications</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
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</tbody>
</table>

## QUALIFICATIONS FRAMEWORK
<table>
<thead>
<tr>
<th>Q</th>
<th>Question</th>
<th>YES</th>
<th>NO</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td>Is there a Qualifications Framework in operation in your country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>What is its current status?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Is it a National or a Regional Framework?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>How do your teacher qualifications fit into this Framework?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>CROSS-COUNTRY RECOGNITION OF QUALIFICATIONS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>Are your basic minimum initial teacher qualifications recognised by the Recruiting Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td>Has your country experienced any difficulties about such recognition?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>Are your other initial teacher qualifications recognised by the Recruiting Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td>Are there any formal recognition agreements about teacher qualifications between your country and the Recruiting Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>If yes, please list the agreements.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>Does your country recognise teacher qualifications from the Source Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>What is the procedure for recognition?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>Which authority provides official recognition of teacher qualifications from the Source Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 30 | Are there any formal recognition agreements about teacher qualifications between your country and the Source Country? | YES  
NO  
Not applicable |
| 31 | If yes, please list the agreements. | |
| 32 | If you have any general comments about the matters raised in Section B you can list them here. | |
| 33 | Is there anything in addition to a basic qualification needed for recognition for employment in a public school? | YES  
NO |
| 34 | If yes, please specify. | |
| 35 | Do teachers with the basic qualification have to serve probation in a school to qualify for recognition as a teacher in a public school? | YES  
NO |
| 36 | If yes, for how long? | |
| 37 | Are any other conditions required for recognition? | |
| 38 | If other, please specify. | |
| 39 | Is a teacher recognised for employment in a public school in your country recognised for such employment at the same level in the Recruiting Country? | YES  
NO  
Not applicable |
| 40 | Have teachers from your country experienced any difficulties about such recognition by the Recruiting Country? | YES  
NO  
Not applicable  
Not known |
| 41 | Does the Recruiting Country place any additional requirements for such recognition? | YES  
NO  
Not applicable |
| 42 | Are there any formal recognition agreements about teacher employment between your country and the Recruiting Country? | YES  
NO  
Not applicable |
# SECTION C – EMPLOYMENT AS A TEACHER

<table>
<thead>
<tr>
<th></th>
<th>Question</th>
<th>Options</th>
</tr>
</thead>
</table>
| 43| Does your country recognise for employment in a public school in your country a teacher so recognised in the *Source Country*? | YES  
NO  
Not applicable |
| 44| Does your country offer induction programmes for recruited teachers?     | YES  
NO  
Not applicable |
| 45| What is the procedure for recognition of a recruited teacher for employment as a teacher in a public school in your country? |                          |
| 46| Which authority provides official recognition?                           |                          |
| 47| If you have any general comments about the matters raised in Section C you can list them here |                          |
## SECTION D – TEACHER PROFESSIONAL REGISTRATION

### PROFESSIONAL REGISTRATION IN COUNTRY

<table>
<thead>
<tr>
<th>Question</th>
<th>YES</th>
<th>NO</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>48 Is there a professional council (or similar body) for teachers in your country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>49 Is professional registration required for employment in the public school system?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>50 What is required for professional registration?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>51 Can professional registration lapse/be suspended?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>52 On what grounds?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### CROSS-COUNTRY RECOGNITION OF PROFESSIONAL REGISTRATION

<table>
<thead>
<tr>
<th>Question</th>
<th>YES</th>
<th>NO</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>53 If your country has professional registration of teachers, is such registration recognised by the Recruiting Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>54 Has your country experienced any difficulties about such recognition?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>55 Are there any formal recognition agreements about teacher professional registration between your country and the Recruiting Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>56 Are there any formal links between a professional teachers’ council in your country and a similar professional body in the Recruiting Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>57 Does your country recognise teacher professional registration from the Source Country?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>58 What is the procedure for recognition?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>59 Which authority provides official recognition?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>60</td>
<td>If you have any general comments about the matters raised in Section D you can list them here.</td>
<td></td>
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<tr>
<td>-----</td>
<td>------------------------------------------------------------------------------------------------</td>
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</tbody>
</table>
Please list below official documents relevant to this investigation: (Title, date, web address)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>61</td>
<td>Qualifications</td>
</tr>
</tbody>
</table>

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>62</td>
<td>Licence to teach in a public school</td>
</tr>
</tbody>
</table>

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>63</td>
<td>Professional Registration</td>
</tr>
</tbody>
</table>

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>64</td>
<td>Bilateral agreements between Source and Recruiting Country</td>
</tr>
</tbody>
</table>

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
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<tbody>
<tr>
<td>65</td>
<td>Other</td>
</tr>
<tr>
<td>66</td>
<td>Please list your suggestions below.</td>
</tr>
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</tbody>
</table>
### APPENDIX 2: QUESTIONNAIRE RESPONDENTS

<table>
<thead>
<tr>
<th>Country</th>
<th>Name</th>
<th>Organisation</th>
<th>Position</th>
<th>Contact details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Australia</td>
<td>Tim Bryant</td>
<td>Dept of Education Science and Training</td>
<td>Assistant Director, Teaching Assessments</td>
<td>[0961] 26 240 8606 6 240 9783 <a href="mailto:tim.bryant@dest.gov.au">tim.bryant@dest.gov.au</a></td>
</tr>
<tr>
<td>England</td>
<td>Roger Frost</td>
<td>Dept for Education and Skills</td>
<td>Team Leader</td>
<td>[0944] 207 925 6409 207 925 6819 <a href="mailto:roger.frost@dfes.gsi.gov.uk">roger.frost@dfes.gsi.gov.uk</a></td>
</tr>
<tr>
<td>Jamaica</td>
<td>Philbert Dhyll</td>
<td>Tertiary Unit, Ministry of Education and Youth</td>
<td>Assistant Chief Education Officer</td>
<td>[091876] 502 6045 (52) [091876] 949 5767 <a href="mailto:edter@cwjamaica.com">edter@cwjamaica.com</a></td>
</tr>
<tr>
<td>Mauritius</td>
<td>Ricaud Auckbur</td>
<td>Ministry of Education and Human Resources</td>
<td>AG. Director, Post Secondary and Tertiary Section</td>
<td>[09230] 601 5214 [09230] 686 8554 <a href="mailto:rauckbur@mail.gov.mu">rauckbur@mail.gov.mu</a></td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>Hilary Henderson</td>
<td>Department of Education for N Ireland</td>
<td>Executive Officer / Qualifications</td>
<td>0287 131 9025 0287 131 9190 <a href="mailto:hilary.henderson@deni.gov.uk">hilary.henderson@deni.gov.uk</a></td>
</tr>
<tr>
<td>South Africa</td>
<td>Francis Nzama</td>
<td>National Department of Education</td>
<td>Chief Director, Internal Relations</td>
<td>+2712 312 5329 +2712 323 3253 <a href="mailto:nzama.f@doe.gov.za">nzama.f@doe.gov.za</a></td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>Y.A.N.D. Yapa</td>
<td>Ministry of Education</td>
<td>Director, National Colleges of Education</td>
<td>[0994] 11 253 3462 <a href="mailto:isurupaya@moe.gov.lk">isurupaya@moe.gov.lk</a></td>
</tr>
</tbody>
</table>
## APPENDIX 3: SYNTHESISED QUESTIONNAIRE FEEDBACK

### Jamaica

**NOTE:** Questionnaire completed with England as the Recruiting Country

<table>
<thead>
<tr>
<th></th>
<th>Basic information</th>
<th>Between 251 and 500 teachers migrated to England from 2001 to 2005</th>
</tr>
</thead>
</table>
| B | Teacher qualifications | Primary  
Teacher qualifications in the country  
Admission – 5 CSec passes (Grades 1–3 / equivalent to GCE O Level grades A–C)  
Three years of post-school training.  
Basic minimum qualification – Diploma in Teaching  
Secondary  
Admission – 5 CSec passes (Grades 1&2 / equivalent to GCE O Level grades A&B) in area of specialisation.  
Three years of post-school training.  
Basic minimum qualification – Diploma in Teaching |
|   | Qualifications framework | Established NQF  
Teacher qualifications conform and articulate with the NQF |
|   | Cross-country recognition of qualifications | Basic minimum qualifications recognised (by England)  
There have been some difficulties about such recognition  
There are no formal agreements |
| C | Employment as a Teacher | Nothing in addition to basic minimum qualification is required  
Six month probation – and need to meet performance targets |
|   | Recognition for employment as a Teacher in a public school in country | Teachers recognised for employment in Jamaica are not recognised for employment at the same level in England  
Difficulties have been experienced  
There are additional requirements, and there are no formal recognition agreements |
| D | Teacher professional registration | Professional registration not recognised in England |
|   | Professional registration in country | Professional registration is required for eligibility for employment  
Professional registration requires: Medical Certificate; 2 character references, recognised qualification, etc  
Professional registration can be suspended on grounds of professional misconduct and/or medical grounds |
|   | Cross-country recognition of professional registration | |
| E | Relevant documents | |
| F | Suggestions about improving this questionnaire for the purposes of Phase 2 of this project | Countries should not be placed in predetermined groups as there may not be a relationship within the selected cluster – this would limit responses |
### Mauritius

**NOTE:** Questionnaire completed as if Mauritius was a recruiting country – recruiting teachers from India

|   | Basic information | Recruiting teachers from India  
Fewer than 20 migrated from India to Mauritius between 2001 and 2005 |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>Teacher qualifications</td>
<td></td>
</tr>
</tbody>
</table>
Teacher qualifications in the country  
Primary  
Admission – A Level  
Two years after A Level  
Teachers’ Diploma  
Secondary  
Admission – GCE A Level  
Three years after A Level  
Degree (from any recognised University worldwide – teachers do not need a professional qualification (such as a PGCE) to get into teaching in Mauritius.  
Qualifications framework  
Established NQF (developed since 2002)  
Cross-country recognition of qualifications  
Mauritius does recognise teacher qualifications from India. There is a protocol between the countries, and a policy on recognition/equivalence. Formal recognition for all qualifications as per the cultural agreement between the government of the Republic of India and the government of the Republic of Mauritius. Mauritian teachers do emigrate – but there is unfortunately no survey as to the exact figure of teacher emigrants, which countries they leave for, and whether they are able to enrol as teachers there. |
| C | Employment as a Teacher | Recognition for employment as a Teacher in a public school in country  
No requirements beyond basic qualification. One-year probation – if favourably reported on after one year, teacher is confirmed in the post.  
Cross-country recognition for employment as a teacher in a public school  
There are induction programmes for recruited teachers. Qualification must be recognised as equivalent to the minimum qualification for the level of teaching (Primary: Diploma; Secondary: Degree). |
| D | Teacher professional registration | Professional registration in country  
No professional council.  
Cross-country recognition of professional registration  
  
E | Relevant documents |  
F | Suggestions about improving this questionnaire for the purposes of Phase 2 of this project | Add a field for “unknown” for some questions. Allow more blank spaces for remarks. |
## Sri Lanka

**NOTE:** Questionnaire completed as if Sri Lanka sources teachers from Canada, and Australia recruits teachers from Sri Lanka

<table>
<thead>
<tr>
<th></th>
<th>Basic information</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Between 2001 and 2005 there were fewer than 20 migrants on the two indicated routes.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Teacher qualifications</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>Teacher qualifications in country</td>
<td>Same for primary and secondary. Admission GCE (A/L) Number of post-school years of training unclear (Perhaps 3 years?) Basic minimum qualification – Graduate from a university or National College of Education</td>
</tr>
<tr>
<td>C</td>
<td>Qualifications framework</td>
<td>Established NQF</td>
</tr>
<tr>
<td>D</td>
<td>Cross-country recognition of qualifications</td>
<td>Minimum qualification recognised in recruiting country. No difficulties experienced. No formal agreements.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Employment as a Teacher</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td>Recognition for employment as a Teacher in a public school in country</td>
<td>No additional requirement. Six months probation –with test at end.</td>
</tr>
<tr>
<td>D</td>
<td>Cross-country recognition for employment as a teacher in a public school</td>
<td>Those who qualified from NCoE are directly recruited. The Ministry of Education recruits teachers and deploys them according to vacancies.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Teacher professional registration</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>D</td>
<td>Professional registration in country</td>
<td>No professional council.</td>
</tr>
<tr>
<td>E</td>
<td>Cross-country recognition of professional registration</td>
<td></td>
</tr>
<tr>
<td>F</td>
<td>Relevant documents</td>
<td></td>
</tr>
</tbody>
</table>

| F | Suggestions about improving this questionnaire for the purposes of Phase 2 of this project |   |
**South Africa**

NOTE: The questionnaire was completed independently by both
(a) the Department of Education, and
(b) the South African Council for Educators

<table>
<thead>
<tr>
<th></th>
<th>Basic Information</th>
</tr>
</thead>
</table>

**B Teacher qualifications**

<table>
<thead>
<tr>
<th></th>
<th>Teacher qualifications in country</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Same for primary and secondary Admission – 12 years of schooling (matriculation exemption) 4 years post school training. BEd or degree + PGCE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Qualifications framework</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Established NQF – but under review.</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th></th>
<th>Cross-country recognition of qualifications</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>From Mauritius. Mauritian qualifications recognised – but need to be assessed on a case-by-case basis. To Australia SA Qualifications recognised in Australia – no difficulties experienced. No bilateral agreements – only CW Protocol.</td>
</tr>
</tbody>
</table>

**C Employment as a Teacher**

<table>
<thead>
<tr>
<th></th>
<th>Recognition for employment as a Teacher in a public school in country</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>In addition to qualification – must be registered with South African Council for Educators. Six months probation.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Cross-country recognition for employment as a teacher in a public school</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Requires registration with SACE.</td>
</tr>
</tbody>
</table>

**D Teacher professional registration**

<table>
<thead>
<tr>
<th></th>
<th>Professional registration in country</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes – South African Council for Educators (SACE) Professional registration required for employment. Registration can be suspended – disciplinary procedures.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Cross-country recognition of professional registration</th>
</tr>
</thead>
</table>

**E Relevant documents**

<table>
<thead>
<tr>
<th></th>
<th>Suggestions about improving this questionnaire for the purposes of Phase 2 of this project</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Insufficient space to provide adequate responses. Comment from SACE. Recent foreign applicants that have requested SACE registration were primarily from Zimbabwe (33 so far in 2006). The total number of foreign applications received for 2006 was 51 – none was from Mauritius and 45 from other African countries (33 from Zimbabwe and 12 from other countries – the research should focus on Africa. According to Statistics SA, total numbers of educators and related occupations migrating until 2003 were 90 immigrating and 66 emigrating (a net loss of 576.)</td>
</tr>
</tbody>
</table>

The Recognition Of Teacher Qualifications And Professional Registration Status Across Commonwealth Member States
## Australia

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<tr>
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<tbody>
<tr>
<td>B</td>
<td>Teacher qualifications</td>
<td>Teacher qualifications in country</td>
<td>Same for primary and secondary. Admission to these programmes: Year 12 certificate above a designated cut off. Four years of post-school study BEd, or Bachelor degree + Diploma in Education</td>
</tr>
<tr>
<td></td>
<td>Qualifications framework</td>
<td>Established NQF. Teacher qualifications are at the tertiary level which are identified in the HE sector accreditation level of the Australian QF.</td>
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</tr>
<tr>
<td></td>
<td>Cross-country recognition of qualifications</td>
<td>Teacher qualifications from S Africa are recognised. Assessment by AEI–NOOSR against criteria established by representatives from State and Territory Teacher Registration Authorities. The criteria cover educational, professional and language requirements. No formal recognition agreements.</td>
<td></td>
</tr>
<tr>
<td>C</td>
<td>Employment as a Teacher</td>
<td>Recognition for employment as a Teacher in a public school in country</td>
<td>Six months probation after basic qualification. No other conditions for employment.</td>
</tr>
<tr>
<td></td>
<td>Cross-country recognition for employment as a teacher in a public school</td>
<td>Induction programmes offered for recruited teachers. Many South African teachers are employed in Australia, based on the equivalence of their qualifications.</td>
<td></td>
</tr>
<tr>
<td>D</td>
<td>Teacher professional registration</td>
<td>Professional registration in country</td>
<td>There is a professional council. Professional registration is required for eligibility for employment in a public school. Conditional registration is available for teachers after 3 years if they commit to a further year of tertiary education. Professional registration can lapse. Grounds: vary from jurisdiction to jurisdiction—in NSW: contravening professional responsibilities.</td>
</tr>
<tr>
<td></td>
<td>Cross-country recognition of professional registration</td>
<td>Registration in the source country (South Africa) is a prerequisite for a successful application to migrate to Australia as a teacher.</td>
<td></td>
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<tr>
<td>E</td>
<td>Relevant documents</td>
<td>Education in Australia is primarily a matter for the individual states and territories. The answers provided in this survey are indicative only and address the issue in just one state—i.e. NSW. The answers would vary depending on the state/territory responding. Phase 2 should acknowledge this. Registration is no guarantee of employment.</td>
<td></td>
</tr>
<tr>
<td>F</td>
<td>Suggestions about improving this questionnaire for the purposes of Phase 2 of this project</td>
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### England

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<tbody>
<tr>
<td>B</td>
<td>Teacher qualifications</td>
<td><strong>Teacher qualifications in country</strong> Same for primary and secondary. Admission to programme – Grade C at GCSE in English and Maths and a science subject (and relevant subjects in the case of some degrees.) Four years of post-school training Minimum qualification – a degree or equivalent (In England teaching is an all graduate profession.)</td>
</tr>
<tr>
<td></td>
<td>Qualifications framework</td>
<td>Established NQF. Standards and requirements for training courses are overseen by a central body – the Training and Development Agency for Schools</td>
</tr>
<tr>
<td></td>
<td>Cross-country recognition of qualifications</td>
<td>Teacher qualifications from India are not (automatically) recognised. There are no formal recognition agreements. Basic qualifications are assessed against local degree standards. If accepted, the recruitee can begin to teach, but training is needed and available to bring entrants fully up to QTS level.</td>
</tr>
<tr>
<td>C</td>
<td>Employment as a Teacher</td>
<td><strong>Recognition for employment as a Teacher in a public school in country</strong> In addition to the basic qualification recognition for employment involves the following: Physical fitness requirements; basic skills test in English maths and science; able to use ICT as a teaching aid; no criminal background that might make the candidate unsuitable to work with children. One year’s probation. Must register with professional council</td>
</tr>
<tr>
<td></td>
<td>Cross-country recognition for employment as a teacher in a public school</td>
<td>Induction programmes are offered for recruited teachers Employer decides whether to offer teacher a job Will need a work permit to enter. Can work as “unqualified” – gaining QTS will improve pay and career prospects. Permitted to teach for up to 4 years without gaining QTS.</td>
</tr>
<tr>
<td>D</td>
<td>Teacher professional registration</td>
<td><strong>Professional registration in country</strong> General Teaching Council for England (GTCE) Professional registration required for employment Professional registration requires being recommended for QTS (by an examining body) Provisional registration will soon be available for those working towards QTS Professional registration can be suspended – usually on the grounds of misconduct.</td>
</tr>
<tr>
<td></td>
<td>Cross-country recognition of professional registration</td>
<td>No</td>
</tr>
<tr>
<td>E</td>
<td>Relevant documents</td>
<td></td>
</tr>
<tr>
<td>F</td>
<td>Suggestions about improving this questionnaire for the purposes of Phase 2 of this project</td>
<td>This form allows me to complete for only one sourcing country.</td>
</tr>
</tbody>
</table>
### Northern Ireland

| A | Basic Information | No record held of teachers migrating out of N Ireland. 38 applications for confirmation of eligibility were made – but it is not known how many actually took up teaching posts. Fewer than 20 migrated from Canada to Northern Ireland over the past five years. |
| B | Teacher qualifications | Teacher qualifications in country: Same for Primary and Secondary. Admission to a teacher education programme requires Maths & English language GCSE O Level Grade C or above. Four years of post-school study. The basic minimum qualifications are either a BEd or (a degree) and PGCE. The university issues the qualifications but the Department (DENI) recognises teacher Eligibility. |
| Q | Qualifications framework | Established NQF. |
| C | Cross-country recognition of qualifications | Does recognise teacher qualifications from Canada. Evidence of authenticity of qualifications: A letter from the DoE in home country recognising them as a qualified teacher. Official recognition by DENI. No formal agreements (about recognition of teacher qualifications) between Canada and N Ireland. |
| C | Employment as a Teacher | Nothing in addition to the basic qualifications is needed for recognition for employment in a public school. No probation requirement. |
| D | Professional registration in country | Professional registration can lapse due to non-payment of fees or a decision made by the council. |
| D | Cross-country recognition of professional registration | No formal agreements about professional recognition. After eligibility has been confirmed by the DENI the teacher must make application to the GTCNI and pay the registration fee. If satisfied, the GTCNI provides professional registration. |
| E | Relevant documents | |
| F | Suggestions about improving this questionnaire for the purposes of Phase 2 of this project | |
APPENDIX 4: ABBREVIATIONS AND ACRONYMS USED

ADEA  Association for the Development of Education in Africa
AJCPTA  Australian Joint Council of Professional Teaching Associations

BEd  Bachelor Degree in Education
ACQA  Association of Commonwealth Qualifications Authorities (proposed)
CARICOM  Caribbean Community – Member States are Antigua and Barbuda, Bahamas, Barbados, Belize, Dominica, Grenada, Guyana, Jamaica, Saint Lucia, St. Kitts and Nevis, St. Vincent and the Grenadines, Suriname, and Trinidad and Tobago
CCEM  Conference of Commonwealth Education Ministers
CEA  Cultural Experiences Abroad
CFPTC  Commonwealth Forum of Professional Teacher Councils (proposed)
COMESA  Common Market for Eastern and Southern Africa – Member States include Burundi, Comoros, Democratic Republic of Congo, Djibouti, Egypt, Eritrea, Ethiopia, Kenya, Madagascar, Malawi, Mauritius, Rwanda, Seychelles, Sudan, Swaziland, Uganda, Zambia and Zimbabwe
CPD  Continuing Professional Development
CQFW  Credit and Qualifications Framework Wales
CRA  Competent Recognition Authority
CTF  Canadian Teachers’ Federation
CTG  Commonwealth Teachers Grouping
DENI  Department of Education for Northern Ireland
E4A  Education For All
ECOWAS  Economic Community of West African States – Member States include Benin, Burkina Faso, Cape Verde, Côte d’Ivoire, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, and Togo
EI  Education International
EQF European Qualifications Framework
EU European Union – Member States are Austria, Belgium, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxemburg, Malta, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, The Netherlands and the United Kingdom
FeA Framework for Achievement
GCE General Certificate of Education
GCSE General Certificate of Secondary Education
GTCE General Teaching Council for England
GTCNI General Teaching Council for Northern Ireland
JTA Jamaica Teachers’ Association
ILO International Labour Organisation
ISCED International Standard Classification of Education
NARIC National Academic Recognition Information Centre
NCTE National Council for Teacher Education (India)
NIC National Information Centre
NICATS Northern Ireland Credit Accumulation and Transfer Scheme
NPDE National Professional Diploma in Education
NQAI National Qualifications Authority of Ireland
NQF National Qualifications Framework
OECD Organisation for Economic Co-operation and Development
PGCE Post-Graduate Certificate in Education
PGDE Post-Graduate Diploma in Education
QCA Qualifications and Curriculum Authority
QTS Qualified Teacher Status
SADC Southern African Development Community – Member States are Angola, Botswana, Democratic Republic of Congo, Lesotho, Malawi, Mauritius, Madagascar, Mozambique, Namibia, South Africa, Swaziland, Tanzania, Zambia and Zimbabwe
SADCCQF Southern African Development Community Qualifications Framework
SACE South African Council for Educators
SAQA South African Qualifications Authority
TCCA  Technical Committee on Certification and Accreditation (SADC)
UK     United Kingdom
UN     United Nations
UNESCO United Nations Education, Scientific and Cultural Organisation
APPENDIX 5: DOCUMENTS USED


McNamara, T. & Lewis, S. 2004. Recruitment of overseas trained teachers. University of Manchester on behalf of the NASU Unit.

Africa, 27–30 October 2005, hosted by Rhodes University and University of Fort Hare.


SADC Technical Committee on Certification and Accreditation. 2006. Draft instrument for collecting information on existing qualifications, assessment/evaluation criteria and procedures in SADC.


SAQA. 2006. An investigation into the inclusion of qualifications currently registered as professional on the National Qualifications Framework. Phase 1 Research Report to be distributed for public comment between February and April 2006.


APPENDIX 6: RECOMMENDATIONS FROM THE WORKING GROUP ON TEACHER QUALIFICATIONS

Senior officials and observers appointed to the Commonwealth Working Group on Teacher Qualifications met in Pretoria, Tshwane, South Africa from 27–29 September 2006, following a request by Ministers of Education at the adoption of the Commonwealth Teacher Recruitment Protocol (2004) that a Working Group should “investigate systems and criteria for the assessment of equivalencies of teacher qualifications and of professional registration status, where applicable, across the Commonwealth”.

We have studied the research report commissioned by the Secretariat and prepared by the South African Qualifications Authority (SAQA), and considered thoroughly the recommendations contained therein. We gratefully acknowledge the research undertaken by SAQA – noting the difficulties experienced in accessing reliable data from countries – and the quality of analysis and the recommendations provided. The full report will be available on the Commonwealth website and will be circulated to senior officials prior to the 16th Conference of Commonwealth Education Ministers (16CCEM).

In light of our deliberations over these three days, we propose to the Commonwealth Education Ministers that the following recommendations receive their consideration and approval and that these should inform the mandates and work plan for Commonwealth education, which will be agreed at the 16th Conference of Commonwealth Education Ministers in Cape Town, South Africa in December 2006. It is our belief that these recommendations will assist migrating teachers as well as strengthen and enrich education systems for the benefit of learners.

If agreed, Ministers would be required to mandate the Secretariat to establish a Steering Committee to take responsibility for the proposed actions. In doing so, consideration should be given to matters of representivity, efficiency, and for purposes of continuity, drawing on the members of the current Working Group.
<table>
<thead>
<tr>
<th>Recommendation from the Working Group on Teacher Qualifications</th>
<th>Description and further clarification</th>
<th>Corresponding Report Recommendation</th>
</tr>
</thead>
</table>
| 1. Develop a Teacher Qualifications Comparability Table | In developing the *Teacher Qualifications Comparability Table* it is suggested that the following is considered:  
- Including as a first step only minimum initial teacher education qualifications  
- Based on a combination of the comparability criteria (page 38) and ISCED criteria (page 41)  
- Populated with the data from the nine countries included in the pilot study  
- As a further step the table should be expanded to include other relevant teacher qualifications leading to the development of a *Commonwealth Qualifications Database* (not rigid, electronic, web-based, easy to update) for teacher qualifications\(^20\).  

The purposes of the comparability table will be to (i) provide the basis for the pathways for the attainment of qualified teacher status for migrating teachers. Secondly (ii) to clarify the responsibility of the employer in the recruiting country to “*provide dedicated programmes to enable teachers to achieve fully qualified status*”\(^{CTRP, 2004}\). It will also constitute a first step towards determining qualifications equivalence of teacher qualifications. In determining the employability of migrating teachers, countries are encouraged to take into account professional history including experience and professional development. | Develop a qualifications comparability matrix (2.5.2)  
Refer to pages 45–46 and 81 |
| 2. Build on existing structures and systems including qualification frameworks and quality assurance systems. | Existing structures could include:  
- Established NQFs and RQFs  
- National and regional qualifications frameworks under construction  
- Formal quality assurance systems  
- Other systems of in-country recognition of teacher qualifications.  

While it has been pointed out that qualifications frameworks are not without problems, and probably still need to fulfil many of the promises associated with them, it has also been clearly shown that they offer many advantages for the recognition of teacher qualifications. | Utilise the advantages of national and regional qualifications frameworks (2.5.1)  
Refer to pages 45 and 80 |

\(^{20}\)This database on teacher qualifications could form the basis for a more extensive database including other sectors as well.
3. Establish a network of Commonwealth qualifications authorities

Suggested responsibilities for a network of Commonwealth Qualifications authorities include:

- Clarify and communicate qualifications-related terminologies, such as qualification, equivalence, credit and credit equivalence, comparability, level descriptors, credits, and so on
- Appropriate mechanisms to create opportunity for Member States to share best practice in relation to the development of NQFs
- The activities of this network could lead towards the establishment of a more formal Association of Commonwealth Qualifications Authorities.

Establish a formal grouping of qualifications authorities, the Commonwealth Association of Qualifications Authorities (2.5.3) Refer to pages 46–47 and 81

4. Encourage and support cross-country links between teacher professional registration authorities

- Existing links between national teacher professional registration authorities should be further developed across the Commonwealth
- Countries without teacher professional registration authorities should be encouraged to establish such bodies
- Professional registration authorities should liaise with each other in developing a Commonwealth Standard for Teacher Professional Registration

Foster cross-country links between teacher professional councils (3.5.1) Refer to pages 62 and 82

5. Reinforce the professional status of teachers by encouraging and supporting the profession to develop a Commonwealth Standard for Professional Registration

- Establishing a designation (based on agreed criteria) for Commonwealth teachers, such as “Commonwealth teacher”
- This activity might lead towards the establishment of a cross-country database of registered teachers including such individuals that have been awarded Commonwealth teacher status
- It is suggested that consideration be given to the maintenance of professional registration being subject to agreed criteria.

Reinforce the professional status of teachers by developing a Commonwealth standard for professional registration status (3.5.2) Refer to pages 62–63 and 82
| 6. Establish a Commonwealth Forum of Teacher Professional Registration Authorities | The main responsibilities of the Commonwealth Forum of Teacher Professional Registration Authorities will include:  
- Clarify and communicate matters pertaining to teacher professional registration status in the Commonwealth  
- Support teacher professional registration bodies in exercising their responsibilities for the professional registration of teacher and continuing professional development  
- Support Member States that do not have teacher professional councils  
- Establish a Commonwealth Teacher Designation that will be recognisable and trusted by employers across Commonwealth Member States  
- Assist and support Ministries in establishing a database on teacher mobility and migration across the Commonwealth | Establish a Commonwealth Forum of Professional Teacher Councils and other de jure Competent Recognition Authorities Refer to pages 63–64 and 83 |
The following Member States attended the meeting and support the above recommendations:

AUSTRALIA  
Represented by Ms Wendy Hastings  
Registrar, Teachers Registration Board of South Australia

CANADA  
Represented by Mr Yves King  
Teacher Certification Registrar, Department of Education

INDIA  
Represented by Ms Anita Kaul  
Secretary, National Council of Education Research and Training (NCERT)

JAMAICA  
Represented by Dr Marcia Stewart  
Executive Officer, Joint Board of Teacher Education

MAURITIUS  
Represented by Mr S Mahadeo  
Director (Curriculum), Ministry of Education

NORTHERN IRELAND  
Represented by Dr. Mark James Barr  
Inspector of Schools

SOUTH AFRICA  
Represented by Mr Duncan Hindle  
Director General, Ministry of Education

UNITED KINGDOM  
Represented by Mr Matthew Mitchell  
Head of Diversity, Initial Teacher Training, Recruitment Training and Development Agency for Schools (TDA)
The main aim of this research has been to investigate the recognition and transferability of teacher qualifications and professional registration status across Commonwealth countries, with a view to developing systems and criteria to assess the equivalence of such qualifications and professional status across the Commonwealth to further the purpose of the *Protocol for the Recruitment of Commonwealth Teachers*.

The South African Qualifications Authority is the national statutory body in South Africa tasked to oversee the development and implementation of the South African National Qualifications Framework. SAQA’s operation structure is configured around three key strategic areas, namely:

- Standards setting and development
- Quality assurance and development
- Electronic management of learner achievements through the National Learners’ Records Database

More information about the South African Qualifications Authority is available by writing to:

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Website: www.saqa.org.za