

Report: Occupational regulation of teachers - Initial discussion

To:	Hon Erica Stanford, Minister of Education		
Cc:	Hon David Seymour, Associate Minister of Education		
Date:	12/02/2025	Deadline:	21/02/2025
Security Level:	In-Confidence	Priority:	Medium
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Drafter:	Ruth Cameron	METIS No:	1342713

Why are we sending this to you?

- You have requested that occupational regulation of the teaching profession forms part of 9(2)(f) of the Education System Reform Bill (ESRB).

What action do we need, by when?

- We seek a discussion with you to establish the scope and direction for the work. We request the signed paper by 21 February to enable this work to progress.

Key facts, issues and questions

- Occupational regulation is a key quality teaching lever that supports achievement outcomes.
- Models of occupational regulation of teachers can be fully independent and profession-led, have no independence and be fully government-led, or be mixed models. While New Zealand has a mixed model, it is more profession-led than many other jurisdictions.
 - This raises a key question about if you wish to maintain an independent profession-led regulator and, if so, then how much government control should exist in this model.
- The Teaching Council of Aotearoa New Zealand (the Council) has one of the widest scopes of functions compared to other jurisdictions we examined.
- As regulatory models become less independent from government they tend to have narrower scopes focused on essential regulatory functions. Setting professional standards for teachers and setting standards for ITE always sit together given their interconnection.
 - This raises a key question about the scope of functions of any occupational regulator, and if we have the right agencies performing the right functions across the system.
- Occupational regulatory reform is likely to be a highly sensitive topic with stakeholders and requires adequate consultation time. 9(2)(f)(iv)

Alignment with Government priorities

1. This report aligns with your Government priority 4: Developing the workforce of the future including leadership development pathways.

We understand you want to reform occupational regulation for teachers

2. You are progressing amendments to strengthen the accountability and transparency of the Teaching Council through ETAB2. You have also requested advice on further changes to the Teaching Council's Governing Council, which we are providing separately.
3. We understand that you are interested in progressing more fundamental reforms to occupational regulation for teachers through your proposed ESRE¹. Through previous briefings (METIS# 1334506), Cabinet submissions (SOU-24-MIN-0071) and conversations, we understand that your highest priority concerns for the teaching workforce are:
 - 3.1. the quality and consistency of Initial Teacher Education (ITE), and
 - 3.2. weak oversight and soft incentives for ongoing training and development, including inconsistency in support for beginning teachers, and unstructured career pathways.
4. We understand your overarching objective for the teacher occupational regulatory system is proportionate regulation that supports and maintains consistently high standards of teaching to support learner outcomes, without creating excessive regulatory barriers that impact supply.
5. We note that legislation will not solve all the challenges with the teaching workforce. However, occupational regulation, through its design (form and functions) and effectiveness of delivery, can contribute to solutions and achieve your objectives for:
 - 5.1. Improved consistency and quality in ITE outcomes.
 - 5.2. Improved structure and consistency for in-service training, career progression and promotion pathways.
6. We also note that you already have non-regulatory work underway to address some of these challenges. For example, you have worked with the Teaching Council to strengthen ITE by raising entry requirements and progressing changes to the ITE programme standards to better reflect your curriculum priorities. You have also made your priorities to the Teaching Council clear through a Statement of Government Policy.

Occupational regulation is a key quality teaching lever

7. Occupational regulation is a tool used to protect the public from the risks of an occupation being carried out incompetently, recklessly or dishonestly¹. It is also effectively used to ensure the workforce has the attributes, skills and knowledge required to deliver the best outcomes, in this case for students.
8. Occupational regulation of teachers is a generally accepted concept internationally. As the number one in-school factor influencing student outcomes, quality teaching is significant to a young person's achievement and therefore life trajectory. The risk of harm through recklessness or incompetence is also high.

¹Office circular (99) 6: Policy Framework for Occupational Regulation www.dpmc.govt.nz/publications/co-99-6-policy-framework-occupational-regulation.

Occupational regulation models range in their degree of independence from government

9. Occupational regulation can either be profession-led and fully independent from government, be government-led with no independence, or be a mixed model².
10. In profession-led regulatory models members develop and enforce their own rules, standards and ethical guidelines and oversee the practice of individuals in the profession. Government-led occupational regulation is where ultimate responsibility sits with the government. This includes creating and enforcing laws and regulations that define how the profession operates. Public safety is usually the primary focus of government-led models. Some of the general benefits and disadvantages of each approach are outlined in Table 1.

Table 1: Comparing different occupational regulatory models

Model	Benefits	Disadvantages
Profession-led	<ul style="list-style-type: none"> Can bring more relevant up-to-date expert knowledge than a government agency for highly capable professions. Can be more efficient and flexible. Can lead to greater professional autonomy feelings of trust and engagement. Peer-led accountability can lift overall standards and conduct. 	<ul style="list-style-type: none"> Risk of rent seeking behaviour where the profession's needs can be prioritised over the needs of the public, e.g. overregulating and impacting supply. Limited external oversight can undermine public confidence. Can have some resistance to change, which can restrict innovation and adaptation to societal changes. Can risk inconsistency with government policy direction.
Government-led	<ul style="list-style-type: none"> Can ensure complete alignment across the system with Government priorities and direction, which can support improved outcomes. Brings maximum accountability and transparency to the public. Can reduce potential conflicts of interest. Can bring more uniformity to training, standards and monitoring which can reduce inconsistency in the quality of service provision. Can bring independence, fairness and impartiality to discipline processes. 	<ul style="list-style-type: none"> Risk of decisions being driven by political agendas. Government agencies can be slow to respond to changes in the profession and limited by bureaucracy and political processes. May not have the same level of expert knowledge and risks regulations that don't reflect the realities of the profession. May reduce professional autonomy and create disengagement. Risk of overregulation.

² Office circular (99) 6: Policy Framework for Occupational Regulation www.dpmc.govt.nz/publications/co-99-6-policy-framework-occupational-regulation.

11. In practice, regulation often tends towards a mixed model whereby government regulation underpins self-regulation.³ Mixed models aim to find a middle ground between these risks and benefits. However, mixed regulatory models often struggle with the balance between representing their members' views and priorities and aligning with government priorities.

The Teaching Council is a mixed model but is predominantly profession-led

12. The Teaching Council is established as a body corporate under the Education and Training Act (2020). However, teacher occupational regulation has been problematic and contested for the best part of a century.⁴ It was initially established as the Teacher Registration Board and has also been a Crown Entity.
13. While its legislative framework is set by government, in practice the Teaching Council is led by the profession. Its board consists of education professionals and its policies and standards are shaped by consultation with teachers and the education sector. It has a challenging task reflecting both government priorities and the professional judgement of teachers and education leaders.
14. While not directly accountable to Parliament, given the critical role of teachers in the education system and the substantial government and public interest in the Council's work, the Government maintains oversight over the Council through several avenues.
 - 14.1. **Governance:** The Board structure includes 13 members: 6 members appointed by the Minister and the remaining 7 members elected by members from early childhood, primary and secondary teaching sectors. The Minister appoints the Chair and Deputy Chair from the mix of appointed or nominated members.
 - 14.2. **Accountability:** There are several measures outlined in the Act, including enabling the Minister to request an independent report of the Council's functions, require a financial statement or other information related to the performance of its functions, and issue Statements of Government Policy (SoGPs) related to the Council's functions. The Teaching Council must have regard to these statements.
 - 14.3. **Transparency and oversight:** Consultation is required to consult with the Minister before making changes to ITE standards that lead to teacher registration and the criteria for teacher registration.
15. Your Accountability and Transparency package, when passed, will also build on these measures by:
 - 15.1. Introducing an advisory role for the Secretary for Education in ITE.
 - 15.2. Extending consultation requirements to include the Teaching Standards.
 - 15.3. Requiring annual reporting on how SoGPs have been taken into account.
16. You are also considering making further changes to the Teaching Council's Governing Council to re-balance it towards Ministerial control. If progressed, this would through be an Amendment Paper to ETAB2 and would be done without public consultation.

³ Office circular (99) 6: Policy Framework for Occupational Regulation www.dpmc.govt.nz/publications/co-99-6-policy-framework-occupational-regulation.

⁴ Alcorn, N (2019). Between the profession and the state: A history of the Education Council of Aotearoa New Zealand.

New Zealand's teacher regulation is more profession-led, with greater independence from government than many other jurisdictions

17. We have looked at the occupational regulatory model for teachers in six other jurisdictions. Annex 1 provides an overview of where these models and New Zealand sit on a scale from fully independent and profession-led to no independence and fully government-led.
18. No scheme is fully profession-led. Scotland has one of the most self-regulated models and the only model we consider to be more profession-led than New Zealand. It has minimal government oversight and is fully teacher-led with no Ministerial board appointments.
19. Ontario, Victoria and New South Wales are all mixed models like New Zealand, but with greater government levers of control. Notably:
 - 19.1. The Ontario Teaching Council (OTC) moved away from having a fully professionally-led board in 2021 to a 50:50 split between elected and Ministerial appointees. The Minister can also direct the OTC to undertake specific actions or intervene in cases of public concern, even in disciplinary processes.
 - 19.2. The Victorian Institute of Teaching's (VIT) Board is fully appointed by the Minister, and the Minister has other oversight measures such as approving the ITE standards that VIT develops, meaning the VIT plays an advisory role only in key functions.
 - 19.3. The NSW Education Standards Authority differs from most other Australian states in its high level of government-control. It is a statutory authority and its board is fully appointed by the Minister, the CEO is a public sector employee and can be directed by the Minister, and it is subject to all public sector governance requirements.
20. England and Singapore sit at the end of the spectrum of fully government-led regulation, with no independent regulatory body for teachers and functions sitting within government. England splits its functions between three agencies; the Department for Education, the Teacher Registration Agency (TRA), which is an executive agency within the Department, and Ofsted (for quality assurance of ITE), which is independent but operates within a government framework.
21. England undertook major occupational regulatory reforms in 2018 with the disestablishment of the National College for Teaching and Leadership. Early reviews of the TRA indicated it was meeting its objectives but there have been no public facing reports on how effective the whole regulatory system is. Similarly, Ontario's occupational regulatory model changes occurred in 2021, but we are not aware of any public facing evaluations.
22. If you wish to progress this work, officials will contact government officials in these jurisdictions to obtain further information on the possible impacts of moving away from profession-led models.

The relationship between occupational regulatory models and educational performance is difficult to establish

23. There are many factors that impact on educational performance, and it is not possible to establish a causal relationship between profession-led vs government-led regulation and student outcomes.
24. Of the jurisdictions we reviewed, Singapore is a consistently high-performing state. However, it has a fundamentally different education system in many areas than New Zealand. England's PISA results are mixed with the rest of the United Kingdom and therefore would dilute the impact of one occupational regulatory model even further. However, we note the UK tends to perform similarly or slightly worse than New Zealand on key indicators.
25. Canada also performs well on key indicators, and Ontario is seen as one of the higher performing Canadian provinces. However, alongside Ontario, other high performing provinces such as Alberta have recently moved towards direct government control away

from profession-led⁵. Other lower performing provinces such as New Brunswick never had a fully self-regulating teacher body and have always been primarily government-led.

Teacher occupational regulation consists of seven essential functions

26. We looked at occupational regulatory models across different jurisdictions and consider there to be seven essential functions that form the building blocks of all occupational regulatory models, and also three optional functions. The functions, outlined at Annex 1, are:

Essential:

- 26.1. Registration and certification (keep the records).
- 26.2. Setting standards for the profession (including professional development requirements).
- 26.3. Setting standards for qualifications (ITE standards).
- 26.4. Approving ITE qualifications.
- 26.5. Quality assurance and ongoing monitoring of ITE.
- 26.6. Setting conduct and competence requirements (code of conduct or ethics).
- 26.7. Discipline, conduct, competence.

Optional:

- 26.8. Professional leadership, advocacy, developing best practice and research.
 - 26.9. Supporting development of education leaders.
 - 26.10. Curriculum and assessment oversight.
27. Regardless of any reform to occupational regulation, and even if you split them, we consider that the seven core functions must continue to exist in the system. We consider optional functions to be important in the education eco-system. However, we do not think these need to be performed by a regulator. Often in other jurisdictions they are a combined effort between education advocacy bodies, including unions, the government and sometimes not-for-profits.
28. As noted above, essential functions can be split and are in the English model. However, of the essential functions, setting standards for the profession and setting standards for ITE should continue to sit together regardless of any reform as they are so closely linked. This is the case in all the jurisdictions we examined regardless of the regulatory model.

The Teaching Council has a broad scope of occupational regulatory functions

29. The purpose of the Council, as set out under section 478 of the Act, is to ensure safe and high-quality leadership, teaching and learning for children and young people in early childhood, primary and secondary schooling in English medium and Māori medium settings, and settings of other languages, though raising the status of the profession.
30. The Council has a broad regulatory mandate that has grown from an initial focus on registration of teachers. Of the 10 functional building blocks outlined above, the only function it doesn't carry out is curriculum and assessment oversight. This is a rare optional

⁵ Alberta fundamentally shifted to a direct government-led model in 2022. The impact of these changes won't be showing up in any educational achievement results yet and may never do so due to the impact of many other factors on education performance.

function that generally sits with government departments but also sits with the NSW Education Standards Authority.

31. This scope is the broadest of all the justifications we examined as outlined in Annex 1 and Annex 2. While many regulatory bodies also had legislated roles in professional advocacy, development and enhancement, no other jurisdictions had a role in leadership. This is an optional Teaching Council function that it receives separate government funding to perform (note, this funding is ending in 2025).
32. The more government-led models become, the less optional functions they typically include. Their focus tends to remain squarely on delivering essential regulatory functions (with the exception of NSW and its unique role with assessment and curriculum).

This analysis raises two key areas for discussion

33. This comparison analysis highlights key questions that we would like to discuss with you:
 - 33.1. If you wish to maintain an independent profession-led regulator and, if yes, then how much government control should exist in this model.
 - 33.2. The scope of functions of any occupational regulator, and if we have the right agencies performing the right essential and optional functions
34. Your direction on these key questions will help us frame the next stages of this work and develop a detailed workplan, including timelines.

Te Tiriti o Waitangi

35. We know from the Kōrero Mātauranga that iwi, hapū, and Māori communities place a high value on quality teaching for their tamariki and rangatahi, and that they seek greater agency and rangatiratanga in schooling. They want to see more Māori teachers across schooling, and they want to see te reo Māori me ōna tikanga become a normal part of the life of a school or kura. Teacher education is clearly key to these aspirations being realised.
36. There are a number of Te Tiriti obligations that will need to be considered as part of further work. Any move away from profession-led regulation will likely have negative consequences for our alignment with Te Tiriti given it will represent a move away from the principle of tino rangatiratanga. Engagement with Māori will be a critical part of the policy process.

Risks

37. A detailed risks analysis will be essential depending on the direction this work takes.
38. Any significant changes to teacher regulation are likely to be a highly sensitive topic for the profession, particularly in the context of progressing bargaining in 2025. While voter turnout for Teaching Council elections is low (8% in 2022), experience from our recent consultation on the 'lift and shift' ITE proposal demonstrates that the sector strongly rallied behind their independent professional regulator when faced with the prospect that some of its independence might be lost. 2025 is an election year for the Council; voting is already open.⁶
39. If reforms progress, sufficient time for broad consultation, including with all teachers who will be impacted, will help to manage this risk. Depending on the options proposed there could still be significant stakeholder push-back. We understand that many in the sector

⁶ [Voting has opened! \(5 - 28 February\) :: Teaching Council of Aotearoa New Zealand](#)

understood the decision to not proceed with the 'lift and shift' was on the basis of listening to feedback about the risks of government control and loss of profession-led regulation. Given the policy development process underway, the sector was not made aware that the decision was based on the possibility of progressing more significant reforms. If some in the sector are expecting this, they would likely be imagining the timeframes would be post this term of government.

Other considerations – timing and alignment between regulatory reforms

40. Depending on the direction you decide to take, it will be important to align with other work programmes that have an impact on roles and responsibilities in the system. 9(2)(f)(iv)
41. 9(2)(f)(iv)
42. Additionally, through your Transparency and Accountability package you will be strengthening Government's oversight over the Teaching Council. This legislation will not yet be in place when you potentially introduce more substantial reforms as part of ESRE. There is a risk that these reforms that could make the Transparency and Accountability package changes redundant depending on their direction, and there is risk in changing the same legislation twice within the same year.

Next steps

43. We intend to discuss this report with you at a standalone strategy session, to enable adequate time to discuss the issues. We will work with your office to arrange this.

Annexes

The following are annexed to this paper:

- Annex 1: Regulation of Teachers overview
- Annex 2: Regulation of Teachers – Detailed jurisdictional comparison

Recommended Actions

The Ministry of Education recommends you:

- a. **agree** your objective for the teacher occupational regulatory system is proportionate regulation that supports and maintains consistently high standards of teaching to support learner outcomes, without creating excessive regulatory barriers that impact supply.

Agree / Disagree

- b. **note** the information in this brief on models of occupational regulation and comparisons between jurisdictions at Annex 1 and Annex 2.

Noted

- c. **note** this analysis raises two key questions we wish to discuss further with you:

- i. if you wish to maintain an independent profession-led regulator and if yes, then how much government control should exist in this model.
- ii. the scope of functions of any occupational regulator and if we have the right agencies performing the right essential and optional functions.

Noted

- d. **agree** to meet with officials in a standalone strategy session to discuss these questions.

Agree / Disagree

- e. **note** the Ministry of Education will brief you further on the scope and scale of the work and potential reform options following this discussion.

Noted

Proactive Release

- f. **agree** that the Ministry of Education release this paper once Government has made final decisions on reform to teacher occupational regulatory settings, with any information needing to be withheld done so in line with the provisions of the Official Information Act 1982.

Agree / Disagree



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Te Pou Kaupapahere

12/02/2025



Hon Erica Stanford

Minister of Education

18/2/25

Annex 2: Regulation of Teachers – Detailed jurisdictional comparison

Country	New Zealand	England	Scotland	Australia NSW	Australia VIC	Ontario	Singapore
Form							
Occupational regulatory body	Teaching Council of New Zealand as a body corporate established in legislation	No single professional body. Occupational regulatory functions split between the Department, Teaching Regulation Agency (TRA) (an executive agency) and Ofsted (arm's length from government but operating within a government framework)	General Teachers' Council of Scotland (GTC) is established in legislation as an independent regulatory body and charitable trust	New South Wales Education Standards Authority (NESA) is a body corporate established in legislation but is a statutory authority and treated as a government agency for the purposes of any Act	Victorian Institute of Teaching is a body corporate established in legislation	Ontario College of Teachers (OCT) is a body corporate established in legislation	No independent professional body. MoE oversees teacher training, employment and regulation.

Country	New Zealand	England	Scotland	Australia NSW	Australia VIC	Ontario	Singapore
Governance / board make-up	The Teaching Council board is made up of 13 Councillors: seven Councillors are elected by teachers and six are appointed by Minister	All government entities operating under the Department for Education	37 members (19 elected registered teachers, 11 educational stakeholder nominees and 7 lay members appointed by an Independent Appointments Committee.	There is a Board. The Minister appoints the Chair and all other members (+ a CEO (employed by the public service).	14 member board – 13 appointed by GiC on recommendation of the Minister and 1 the Secretary or the nominee of the Secretary	12 member Council consist of six certified teachers and six members of the public <u>appointed by government</u> (significant change from pre 2021 when teachers elected fellow teachers)	All undertaken through MoE
Government oversight measures	Moderate - Several measures including ability to issue Statements of Government Policy, which they must have regard to, request information or undertake audits, annual reporting required to Parliament and consultation with the Minister.	Very high - Part of government and subject to all public sector governance requirements.	Low – some measures including requirements to report on activities to Parliament through an annual report and consultation requirements with the Minister.	High - subject to the control and the direction of the Minister. The CEO reports to the Minister. Minister has the power to direct the NESA on policy matters. Subject to all public sector governance requirements.	High - Must give regard to advice given by the Minister Minister approves ITE standards Must submit reports to the Minister on activities, performance and finances.	High - Minister can request reports and updates, direct the OCT to take specific actions, intervene in cases of public concern. Audit and review and intervene in disciplinary processes. Finance and audit committee oversees OCT's budget.	Very high - all under MoE and subject to public sector oversight measures

Country	New Zealand	England	Scotland	Australia NSW	Australia VIC	Ontario	Singapore
Funding	Primarily funded by teacher registration fees. Government makes contributions towards teacher fees and levies.	Fully government funded – no fees	Fully funded by fees teachers and college lecturers pay (first year probationary teachers get registration paid for by government)	Funded by the NSW Government and must justify its expenditure. Subject to financial audits and performance reviews. Charges fees for some activities i.e. ITE accreditation	Funded through teacher fees	Funded through member fees paid by teachers	All government funded
Essential regulatory functions							
Registration and certification (keep the records)	TC	TRA	GTC	NESA	VIT	OCT	MoE
Setting standards for the profession including ongoing PLD requirements	TC	DfE	GTC	NESA but must align with the Australian Institute for Teaching and School leadership's (AITSL) federal standards	VIT	OCT	MoE

Country	New Zealand	England	Scotland	Australia NSW	Australia VIC	Ontario	Singapore
Code of conduct requirements	TC	DfE	GTC	Yes – supported by code of conduct for public school teachers set by the NSW DoE	VIT	OCT	MoE
Setting standards for qualifications (ITE)	TC	DfE	GTC	NESA - but must align with national accreditation requirements set by AITSL.	VIT recommends for the approval of the Minister - but must align with national accreditation requirements set by AITSL.	OCT	MoE – single ITE provider
ITE approval	TC alongside NZQA and CUAP accrediting programmes	TRA	GTC	NESA	VIT – specific legislated ability to revoke approvals and request information from ITE providers	OCT	MoE – single ITE provider

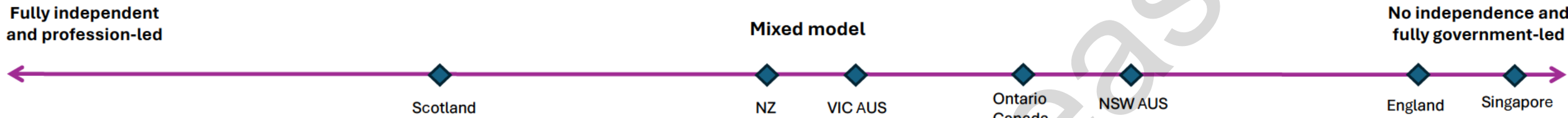
Country	New Zealand	England	Scotland	Australia NSW	Australia VIC	Ontario	Singapore
ITE QA/monitoring	Yes alongside NZQA / CUAP. TC has recently started conducting some review and moderation of ITE providers.	Ofsted inspects and evaluates ITE providers but does not approve or revoke approvals directly.	GTC. The Quality Assurance Agency for Higher Education Scotland (QAA) also reviews in alignment with the Scottish Qualifications framework and conducts subject reviews and other evaluations.	NESA with AITSL. Universities must submit annual reports with data on graduate pass rates, employment outcomes, practicum assessments and feedback from schools.	VIT	OCT (includes how well ITE programmes prepare graduates in key curriculum areas and can take accreditation away).	MoE – single ITE provider
Discipline and compliance	TC	TRA	GTC	NESA	VIT	OCT	MoE
Optional other functions							
Professional leadership, advocacy, developing best practice and research	Yes - these are legislated functions of TC.	No – Professional bodies sit separately to regulatory bodies.	Yes - legislated function to provide independent advice to the Scottish Government.	No - NESA is not a professionally advocacy body, this sits with research bodies, unions and the DoE.	Yes - legislated function to undertake and promote research about teaching and learning.	No – Professional bodies sit separately to regulatory bodies.	No - independent advocacy sits elsewhere in the system. MoE and single ITE provider research best practice.

Country	New Zealand	England	Scotland	Australia NSW	Australia VIC	Ontario	Singapore
Supporting development of professional leaders	The Teaching Council may perform, with written approval from the Minister, leadership functions. This function is funded by the Ministry.	As above	No – accredits leaders ensuring they meet professional standards for leadership but doesn't provide any development support.	As above	No – undertaken between unions and the Victorian Academy of Teaching and Leadership	No - OCT Sets standards for Principal certification including a qualification programme. Respective school principal associations provide development support.	MoE runs leadership programmes.
Curriculum assessment frameworks	MoE and NZQA	DfE	No – sits with Education Scotland.	NESA – develops and approves curriculum and undertakes basic skills testing	DoE runs the Victorian Academy of Teaching and Leadership.	MoE	MoE

Occupational Regulation

Protects the public from the risks of an occupation being carried out recklessly or dishonestly and ensures the workforce has the attitudes , skills and knowledge to deliver the best outcomes

Models of occupational regulation of teachers



Functional Building blocks of teacher occupational regulation		Functions of independent occupational regulators					Functions of government occupational regulators			
		General Teachers' Council Scotland	Teaching Council NZ	Victorian Institute of Teaching	Ontario College of Teachers	NSW Education Standards Authority	TRA	England DfE	Ofsted	Singapore MoE
Essential regulatory functions	Registration and certification (keep the records)	✓	✓	✓	✓	✓	✓	✗	✗	✓
	Setting standards for the profession (including professional development requirements)	✓	✓	✓	✓	✓	✗	✓	✗	✓
	Setting standards for qualifications (ITE standards)	✓	✓	✓	✓	✓	✗	✓	✗	✓
	Approval ITE qualifications	✓	✓	✓	✓	✓	✓	✗	✗	✓
	Quality assurance and ongoing monitoring of ITE	✓	✓	✓	✓	✓	✗	✗	✓	✓
	Setting conduct and competence requirements (i.e. code of conduct or professional responsibility)	✓	✓	✓	✓	✓	✗	✓	✗	✓
	Discipline, compliance and competence	✓	✓	✓	✓	✓	✓	✗	✗	✓
Optional	Professional leadership, advocacy, developing best practice and research	✓	✓	✓	✗	✗	✗	✗	✗	✗
	Supporting development of education leaders	✗	✓	✗	✗	✗	✗	✗	✗	✓
	Curriculum and assessment oversight	✗	✗	✗	✗	✓	✗	✓	✗	✓

Core functions that should sit together