Dear Louise,

**RE Foundation Skills Professional Standards Framework**

The NSW Council for Adult Literacy and Numeracy appreciate this opportunity to provide feedback on the draft **Foundation Skills Professional Standards Framework (February 2017)**. Some of our members had attended the workshops held in Sydney in March, which they found helpful in understanding some of the assumptions and intent of the Framework and the associated tools.

The Council is the peak professional body for adult literacy and numeracy practitioners, including teachers, trainers, program managers, and researchers in NSW. We have been involved in the professional development of LLN practitioners, and advocacy for the field for 40 years. We hope the feedback that draws on our collective knowledge and experience in the field will be considered in the next stage of development of the Professional Standards Framework.

We limit our feedback to the following four key areas:

1. The professional competency model of expertise
2. Domains of the Standard
3. The uses of the Framework
4. The concept of Foundation Skills

1. The professional competency model of expertise

We support the model that is underpinned by a *continuum* of competence. However, we believe there is an issue with the nature of the continuum. The LLN tasks that are appropriate at levels 1 and 2 require supervision of an experienced (and presumably qualified) practitioner. It follows that if such a practitioner is not available at your workplace, then your role is not represented on the matrix at all. There is therefore a strong demarcation between levels 1-2 and levels 3-4 which is not clear.

We believe that the continuum would be strengthened if it did not attempt to incorporate the tasks of those who are not LLN professionals; that is, the continuum should reflect the stages of development of the foundation skills/ LLN *teacher or trainer*, from a beginning teacher/ trainer (i.e. just qualified) to proficient teacher/ trainer to lead teacher/ trainer. We believe the practitioners for whom this framework is most relevant are those who identify as foundation skills/ LLN teachers and trainers. Whilst we acknowledge that foundation skills/ LLN provision is always a complex team effort, those who are not directly interacting with the learners are unlikely to identify professionally as *foundation skills professionals/practitioners*. We believe it diminishes both the status and the distinctive expertise of teachers/ trainers to make the scope of the framework too large.

2. Domains of the Standard
We believe that there is a major omission in the Professional Knowledge domain. Foundation skills/LLN practitioners must have specialist knowledge in English language, literacy and/or numeracy, that is, they must know not only their learners and how to teach them, but the 'content' of what they teach and how to design and teach this 'content'. Teaching, training and any other forms of facilitation of learning must extend and build learners' knowledge as well as skills; if the teachers/trainers do not have the underpinning content knowledge, then they cannot and should not be regarded as professionals in the field. The principle of teaching LLN in real world context does not mean teachers/trainers do not need a solid knowledge of the 'content', that is, of the English language, literacy and mathematical concepts and skills.

The way "know what to do" is described in the Professional Knowledge domain is rather too simplistic and does not reflect the complex understandings of the practice of teaching/training, and what informs this practice.

We also believe that the Professional Engagament domain does not reflect the kinds of professional engagement and learning that should be expected among professionals. We applaud the recognition of sharing knowledge and practice within professional networks and participating in professional development as forms of professional learning; however, we would expect professionals at all levels to be engaged in critical reflection of their practice through inquiry based learning in the workplace, and staying current with new research.

3. The uses of the Framework

We believe that the Framework is written in a way that misses a critical opportunity to raise the standing of the field of foundation skills/LLN. The perception of the expertise required in this field has been steadily diminished over the last 5 to 10 years as university qualifications were replaced by VET qualifications, and employers no longer required specialist LLN qualifications for working in programs such as the SEE. In a context where the TESOL sector has maintained a standard of practitioners holding a postgraduate specialist qualification, and school teachers' standards has been made more rigorous, we should be putting forward a highly aspirational framework that places our field and the practitioners who work in it at the same high level as the other teaching sectors and professionals.

Those of us who attended your workshops found them extremely helpful in assisting us to unpack the complexities of the framework. They are complex documents and there appeared to be multiple interpretations of the implications of the framework so that an ill-informed interpretation could help to reinforce the growing attitude in the present VET context, that LLN is not a specialist field and does not need any specialist qualifications. This is already quite an issue in the VET field. We are aware of many teachers and managers who are promoted as the LLN or literacy specialist in their particular organisation, in spite of a lack of appropriate qualifications or experience. This is most likely not an effort to deceive, but rather a problem of not knowing what you don't know and assuming, for example, that a background in primary teaching can prepare you as an adult literacy specialist. The tools that you have carefully developed are clearly designed to address this, but we wonder who, and under what circumstances, would work through these.

4. Foundation Skills

The title of the framework may well be something that you have no control over, but we have discussed whether it is possible to re-introduce the term 'education'. Foundation Education Professional Standards Framework reinforces the points that there is a specialist
body of knowledge that underpins the field, and that it centres on adult education. That contemporary body of professional knowledge which we fear will be lost, sees literacy numeracy as social practices, a view of literacy and numeracy which is at odds with the term 'skills' which suggests a context-free, purely cognitive view of literacy learning. Historically, adult literacy and numeracy programs in NSW drew its strengths from educating the whole learner, that is, attending to the socio-cultural, affective, motivational as well as cognitive dimensions of learning. In this way, learners were able to gain greater agency as independent learners and in many cases, greater control over their lives. The emphasis on skills alone diminishes the learning and development potentials of literacy and numeracy education. This in turn diminishes – using a neoliberal argument – return to society at large on the public investment in foundation skills

We would be happy to engage in further discussions with you about the points we have summarised above.

Yours sincerely,

[Signature]

Amanda Josling
NSWALNC President