

**LANGUAGES**  
ALLIANCE

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**Submission to the  
Teaching Council of Aotearoa New Zealand  
on proposed changes to the  
'Language Competency for Teaching in  
Aotearoa New Zealand' policy**

**From the  
Languages Alliance Aotearoa NZ**

**9 May 2024**

## Overview

Thank you for the opportunity to comment on the proposed changes to the “Language Competency for Teaching in Aotearoa New Zealand” policy.

This submission is the result of many years of discussions on this issue, within the Languages Alliance and with our colleagues in Pacific Bilingual education settings, other education settings at early childhood, primary and secondary levels, initial teacher education institutions, in-service teacher education providers and other interested parties.

We commend the Teaching Council for taking action on this urgent issue, and for the proposing changes which would go a long way towards solving it, at least for aspiring teachers from the Pacific.

We agree that there is an urgent need to increase teacher supply overall and especially for Pacific bilingual and immersion settings. The existing very high academic English language requirements at entry to teacher training have been a significant barrier preventing people from diverse communities, including those from the Pacific, from becoming teachers.

The proposed changes recognise the value of the language and cultural skills that fluent speakers of Pacific languages bring to the teaching profession. They create a more equitable teacher education pathway for Pacific people who aspire to be teachers. They also remove a significant barrier that has prevented many Pacific people from becoming teachers, and has therefore contributed to the current acute shortage of teachers who are able to teach in Pacific Bilingual settings.

For these reasons we strongly support the purpose and overall direction of the proposed changes. For this reason we support the two recommendations proposed:

1. Introducing an indigenous Pacific languages pathway.
2. Expanding English language evidence criteria.

To further strengthen the proposal, we suggest that a third recommendation be added to the proposal:

3. Removing the additional Teaching Council evidence requirement for English competency at entry to initial teacher education, for all applicants.

Removing the Teaching Council evidence requirement for all aspiring teachers (not just those from the Pacific) would remove a significant barrier that currently prevents many potential students from diverse language backgrounds from teaching in New Zealand. As noted in the proposal, each institution already imposes their own English language requirements for entry to academic study, so there would still be assurance that candidates would have sufficient academic English to enable them to study at degree level, and function effectively in a professional community.

We have further suggested changes to strengthen institutions' entry processes to ensure students from all language backgrounds are supported to gain the academic English language needed to function effectively in the teaching profession.

## The need for change to language entry requirements

The current Language Competency for Teaching in Aotearoa New Zealand policy requires that “Every person applying for entry to Initial Teacher Education (ITE) must provide evidence of their competency in either English or te reo Māori, the languages of New Zealand’s two national curriculum documents.”

The stated purpose of this policy is to ensure the quality of the teaching workforce in Aotearoa, but in practice the policy is having the reverse effect, reducing the diversity of the teacher workforce and robbing the education system of highly skilled future teachers. The impact of the policy is especially acute for potential teachers from the Pacific, because of the

large numbers involved and the very high demand for teachers fluent in a Pacific language. However, the policy also creates barriers and inequities for potential teachers from other diverse language backgrounds.

We have identified eight interrelated issues caused by the current policies, which can be grouped under headings relating to: equity, bilingual education, system implications, teacher supply, diversity, NZSL and Deaf community, validity and academic freedom:

### 1) Equity

- Initial teacher education applicants from other language backgrounds face much more stringent entry criteria than other NZers, placing an additional barrier and significant cost on one group of applicants, based on their linguistic background.
- There is no credit given to this group of NZers for their ability to speak another language (possibly the L1 of some of the students they would be teaching) or for their intercultural skills.
- IELTS 7 (or equivalent) is a more stringent requirement than that for entry onto other graduate or postgraduate programmes (either 6.0 or 6.5 depending on the provider and programme).
- IELTS (even the General version) is a test of academic English; a specialised language genre that needs to be explicitly taught to all users of English when they enter university, whatever their first language and wherever they have been to school.

### 2) Bilingual education

- Bilingual education has been shown to have significant benefits for learners<sup>1,2,3</sup>.
- For teachers who intend to teach in an immersion or bilingual setting, it is even more illogical for the very high academic English requirement to prevent them from accessing an Initial Teacher Education programme, when they would have been teaching mainly in their first language. Current guidelines from both the Ministry of Education (MOE) and from Professor Stephen May<sup>4</sup> recommend at least 80% of instruction in bilingual settings be in the target language, and only 20% in English.
- There is currently a severe shortage of teachers able to teach in bilingual settings, especially in Pacific languages. Urgent action is therefore needed to increase the number of qualified teachers and (teachers with Limited Authority to Teach) LATs who are fluent in Pacific languages.
- Pacific full immersion early childhood centres are under pressure to maintain operations due to the shortage of Pacific teachers who are fluent in their Pacific languages.
- There is particular demand for teacher experts in the three Pacific realm nation languages (Vagahau Niue, Te Reo Kūki Āirani and Gagana Tokelau) which are also listed with the United Nations as endangered.
- The Teaching Council's English language requirement has impacted Pacific early childhood initial teacher education programmes. While Pacific ITE programmes advocate Pacific languages, philosophy and pedagogies, potential candidates are

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<sup>1</sup> McCaffery, J., & Tuafuti, P., in association with Maihi, S., Aukuso, S., Elia, L., & Ioapo, N. (2003). Samoan children's bilingual language and literacy development. In R. Barnard & T. Glynn (Eds.), *Bilingual children's language and literacy development* (pp. 80–10)

<sup>2</sup> Hoff, E., Core, C., Place, S., Rumiche, R., Señor, M. & Parra, M. (2012). Dual language exposure and early bilingual development. *Journal of Child Language*, 39(1), 1-27.

<sup>3</sup> Hoff, E. & Core, C. (2013). Input and Language Development in Bilingually developing Children. *Seminars in Speech and Language*, 34(4), 215-226.

<sup>4</sup> May, S. (2020). Rep. *Research to Understand the Features of Quality Pacific Bilingual Education: Review of Best Practices*. New Zealand Government. <https://www.educationcounts.govt.nz/publications/pasifika/research-to-understand-the-features-of-quality-pacific-bilingual-education>.

turned away due to the English language requirements despite having Pacific language proficiency and cultural intelligence to teach in Pacific contexts.

- A number of schools have closed their bilingual units, and formerly Pacific immersion preschools have shifted to mainly English delivery, because they have been unable to employ teachers who are fluent in their target language.
- The recent provision of funding and support for Pacific Bilingual Education from MOE has greatly increased the number of schools setting up bilingual units. The first requirement is teachers who are fluent in the language, yet these same people are being excluded from teacher training.

### 3) System implications

- In 2017 the Pacific Early Childhood Education programme delivered at AUT was closed because to the strict entry requirement around academic English language proficiency for Pacific peoples who have English as an additional language drastically limited the number of people able to access the course, making the course uneconomic to run.
- Following the closure, the University of Auckland also disbanded their Pacific Early Childhood Education programme in 2019, for similar reasons.
- Both of these ITE programmes specialised in Pacific philosophies, pedagogies, language, culture, identity and spirituality to contribute to the teaching profession in sustaining the cultural intelligence required for teaching in Pacific full immersion and bilingual early childhood education centres. They are a huge loss to the system.
- The issue of the Pacific teacher shortage which currently plagues our Pacific ECE has been exacerbated by the closure of two Pacific ECE ITE programmes from two universities in Auckland, AUT and the University of Auckland.

### 4) Teacher supply

- The English language requirement deprives the system of many potential teachers each year, adding to a chronic teacher shortage.
- This shortage is so acute that both early childhood and secondary teachers are listed for priority residency in the recently updated immigration settings.

### 5) Diversity

- As the diversity of learners across Aotearoa increases, it is becoming even more important that our teaching workforce reflects this, so students can see themselves and their communities reflected in their teachers.
- Having teachers from a range of linguistic and cultural backgrounds is especially valuable for children from non-English-speaking backgrounds, as these teachers understand the strengths the students bring and the challenges these students may face as they settle in a new country.
- On one hand Teach NZ offers scholarships<sup>5</sup> to attract ethnically diverse people into the profession yet on the other hand the English language requirements currently present a significant barrier to these same groups entering the profession.
- Given that over 170 languages are spoken in Aotearoa<sup>6</sup>, with five languages other than English, te reo Maori and Samoan all spoken by more than 1% of the population, it is clear that responses to diversity for the teaching profession need to go beyond only thinking about Pacific languages and cultures.

### 6) New Zealand Sign Language (NZSL) and Deaf community

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<sup>5</sup> <https://www.teachnz.govt.nz/studying-to-be-a-teacher/scholarships/#informationaboutapplying>

<sup>6</sup> Statistics NZ Tatauranga Aotearoa (2021). 2018 Census Totals by Topic – National Highlights (updated). Statistics NZ Tatauranga Aotearoa. Last modified November 4, 2021.

- Deaf children learn best when taught in their first language, which is NZSL, by a teacher who is fluent in that language<sup>7</sup>. There are very few teachers fluent in NZSL so children are learning from non-proficient speakers or even depending on a translator in the classroom.
- For most Deaf people who could potentially teach Deaf children, it would be impossible for them to reach the English language requirements.
- Given that NZSL is an official national language, there is an argument for fluency in NZSL to be recognised as an alternate to fluency in English.

#### 7) Validity

- Clearly, all teachers need to be able to communicate clearly and model effective language use. However, it is highly questionable whether level 7 in each sub-test is an effective measure of English language proficiency for teaching.
- English language tests such as IELTS were developed as tests of academic English language proficiency, not as tests for the type of proficiency needed by teachers.
- It is unclear what evidence was used by the Teaching Council to set the requirement at level 7. For this to be a valid measure, evidence would be needed that level 7 is needed for teaching in NZ schools. We are not aware of any evidence that exists that suggests this to be the case.
- The writing sub-test in particular requires a very academic style of writing at level 7; a very specific style of writing which needs to be adapted for effective communication in non-academic settings, and in some cases may need to be unlearnt.
- Many native speakers of English with a university education would be challenged to achieve an IELTS Level 7 or equivalent across all four sub-tests.
- Anecdotal evidence indicates that many native English speakers do not have the level of academic English needed for university study. Testing only students from non-English speaking backgrounds is therefore illogical and misses a large number of students who need language support.

#### 8) Academic freedom

- The Council imposes the English language requirement for registration *prior* to the individual having the opportunity to study for the profession. This preempts the learning that will undoubtedly take place over the year(s) of full-time study; both in terms of language acquisition and professional competence.
- In other fields, course providers set the entry requirements to courses, based on assessing applicants' ability to successfully complete the course. Imposing an additional requirement at course entry cuts across the course provider's academic freedom.

### Our recommendations

Given the above issues, we recommend:

1. That Recommendations 1 and 2 in the Consultation on proposed changes to the "Language competency for teaching in Aotearoa New Zealand" policy be adopted in full.
2. That in the interim, while a Pacific language competency framework is developed and while the successful applicants complete their training, we recommend that authority to teach provisions should be fast-tracked to enable ECE head teachers and school principals to employ fluent speakers of Pacific languages as LATs. This should apply

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<sup>7</sup> World Federation of the Deaf (2016). Position paper on the language rights of deaf children. <https://wfdeaf.org/news/resources/wfd-position-paper-on-the-language-rights-of-deaf-children-7-september-2016/>

to general positions as well as bilingual education positions, as there is a severe shortage in both areas. Ideally these teachers would also be on a pathway to being fully qualified, as that pathway becomes available.

3. That a third recommendation be added, 'that there be no additional Teaching Council evidence requirement for English language competency, for entry to Initial Teacher Education, beyond the academic institution's own entry requirements, regardless of language background.'
4. That the Teaching Council recommend or require that all initial teacher education institutions use a diagnostic assessment of English language proficiency (such as Auckland University's DELNA) at entry to their course. This would apply to all students, regardless of language background, and would be used to identify areas where support is needed, so that students can fully engage with the course content and can reach the required academic English standards by the end of the course.
5. That all initial teacher education courses should be required to include a course on English for teaching, so all aspiring teachers (from whatever language background) can develop the specific professional language skills required to function effectively in the profession.
6. That the Teaching Council undertake a review of the actual level of academic English that is required of practising teachers, and that this review should inform language requirements for teacher registration or authority to teach. In the interim, the current English language requirements would continue to apply for teacher registration or authority to teach, for applicants not covered by Recommendations 1 and 2 of the proposal.
7. That the Teaching Council investigates a pathway for NZSL signers to become registered teachers.

## Background on the Languages Alliance Aotearoa NZ

The Languages Alliance Aotearoa NZ (formerly known as the Auckland Languages Strategy Working Group, ALSWG) is an unaffiliated working group drawing on expertise and interest in the status and use of languages in New Zealand, and in Auckland in particular. The group is convened by Te Hononga Akoranga COMET (a trust working towards equity in education and skills) and includes members from a wide range of language-related organisations.

The Language Alliance's achievements to date include:

- **Developing *Ngā Reo o Tāmaki Makaurau: Auckland Languages Strategy***, launched in November 2015.
- **Co-hosting a visit in August 2017 by Professor Joseph Lo Bianco**, University of Melbourne, principal author of the Australian National Languages Policy.
- **Preparing a Briefing to the Incoming Ministers on language issues in Aotearoa**, in November 2017.
- **Publishing a *Strategy for Languages in Education***, released in August 2018.
- **Submissions and representations** to multiple language-related consultations.
- **Publishing *Who is out there? Mapping language organisations in Aotearoa***, in April 2024.

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