

**TABOR COLLEGE ADELAIDE**

**SUPPLEMENTARY SUBMISSION**

**TO  
THE SENATE EMPLOYMENT, WORKPLACE RELATIONS  
AND EDUCATION LEGISLATION COMMITTEE**

**24 July 2002**

*Note: This Supplementary Submission is supplementary to the preliminary submission/letter from the Principal of Tabor College Adelaide dated 1 July 2002.*

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*Supplementary to the preliminary submission/letter from the Principal of  
Tabor College Adelaide dated 1 July 2002*

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Tabor College Adelaide appreciates this opportunity to expand its earlier brief submission to the Senate Committee examining the provisions of the Higher Education Funding Amendment Bill 2002, which extends the Postgraduate Education Loans Scheme (PELS) to students enrolled at four private institutions.

Noting the issues that the Senate Committee is to examine, this submission addresses the following:

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The Appendices to this submission (pages 12-52) include supporting documentation, some of which is in the form of correspondence supporting Tabor College's application for government funding for its initial teacher education programs. The most recent correspondence, that since The Hon Dr David Kemp's pre-election policy release of 31 October 2001, specifically supports the inclusion of the College in Table A in the Higher Education Funding Act 1988.<sup>1</sup>

In this submission we indicate why we support the extension of PELS to students at the four named higher education institutions and we also call for additional consideration to be given to the provision of funding for the initial teacher education offered by two of the named higher education institutions.

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<sup>1</sup> This documentation is available only in hard copy. Where letters are included that were not written directly to or by the College, the writers have supplied copies of the letters to the College.



## CONTEXT OF TABOR COLLEGE'S INTEREST

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Tabor College Adelaide is a multidenominational higher education institution offering government-accredited courses in South Australia. The College, which was founded in 1979, aims to provide high quality Christian education for effective life and work, and sees teacher education as one of its most important disciplines. The College's teacher education courses are designed primarily to supply teachers for the growing number of Christian-Independent and Church Schools in Australia, but are also recognised as relevant and appropriate for preparing teachers for public schools. Currently the College has graduates serving in a wide range of private sector and public schools in many parts of Australia.

Tabor College Adelaide's accredited initial teacher education courses are:

- Bachelor of Education (Primary) [four-year];
- Bachelor of Education (Middle School) [four-year];
- Bachelor of Education (Primary) [two-year, graduate entry]; and
- Bachelor of Education (Secondary) [two-year, graduate entry].

Tabor College Adelaide's other accredited teacher education courses are:

- Graduate Diploma in Christian Education;
- Graduate Certificate in Education Studies; and
- Master of Education.

In addition to these programs, Tabor College Adelaide offers undergraduate and postgraduate programs in Counselling, Ministry/Theology and Intercultural Studies. Currently, the College has an enrolment in all disciplines of approximately 317 on-campus EFTSUs, including 150 Bachelor of Education EFTSUs, and 95 distance education EFTSUs.

Since 1998, Tabor College Adelaide has been seeking government funding for its initial teacher education courses, in the form of Higher Education Contribution Scheme (HECS) placements for its teaching students. Currently, Tabor College Adelaide and Christian Heritage College in Queensland are the only higher education institutions in Australia offering full general initial teacher education courses that do not receive government funding and whose students are not eligible for HECS placements.

Tabor College Adelaide has provided extensive correspondence and supporting documentation to the former and current Federal Education Ministers (The Hon Dr David Kemp and The Hon Dr Brendan Nelson), presenting a case for equity in funding for initial teacher education in Australia. (The Appendices to this Supplementary Submission contain documents arranged in reverse chronological order, except for attachments, which give an overview of this process. The process is summarised in the initial pages of "Overview of Tabor College Adelaide's submissions for Commonwealth funding for its initial teacher education programs", on pages 20-23 in the Appendices.) Minister Kemp clearly acknowledged Tabor College's role in providing initial teacher education and in his October 2001 pre-election policy release he stated:

A re-elected Government will provide more students with access to higher education that targets their specific needs by placing several other teacher training institutions in the same position as the University of Notre Dame...

The application of this principle would provide concrete assistance and a more level playing field for those in the community who establish alternative institutions to meet their needs. It would also provide a potentially sounder and more equitable base to assure the supply of suitably qualified teachers in private schools with a religious mission.

A third Howard Government will provide the same arrangements as apply currently to the University of Notre Dame to Bond University, the Melbourne College of Divinity, Christian Heritage College and Tabor College by including them within the framework of the Higher Education Funding Act 1988 (HEFA) while maintaining their ability to have fee-paying students.

We understand that the Howard Government's commitment to granting access to PELS for Tabor College Adelaide and Christian Heritage College, and hence to including them in the Higher Education Funding Act, was made because of the role of these two institutions in providing teachers for Christian schools. We affirm that these two institutions have a unique need for funding in relation to their initial teacher education programs and that the Notre Dame University provides a strong precedent in this regard. We therefore strongly support the inclusion of Tabor College Adelaide and Christian Heritage College in the Higher Education Funding Act 1988 (HEFA). While the creation of a new listing including these two institutions to allow their students to have access to PELS, would be a welcome step, we consider that in the interests of equity and non-discrimination, further consideration should be given to including them in Table A of HEFA, along with the University of Notre Dame.

(Additional information about Tabor College Adelaide and its approach to higher education in Australia can be viewed in the College's response to Minister Brendan Nelson's *Higher Education at the Crossroads* paper, available on the Minister's website: <http://www.dest.gov.au/crossroads/sub.htm>)

## **SELECTION CRITERIA, ACCESS AND PUBLIC SUPPORT**

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### **Selection criteria and access**

Tabor College is a higher education institution which operates on the basis of a Christian ethos and whose purpose is to provide high quality education to equip students for service in a range of occupations, including school teaching, in both the public and the private sectors. The College's teacher education courses, while being ideally suited to preparing teachers for Church and Christian-Independent school settings, are highly acclaimed by the public school sector and are recognised by the Teachers Registration Board of South Australia and by all three State universities in South Australia, as being of a standard at least equivalent to comparable teacher education courses offered in university settings.

Tabor College Adelaide, as explained in the College's admission policy, includes both academic and non-academic entry regulations. Applicants must meet certain academic standards (which include an appropriate level of educational achievement and English language ability). These requirements are similar to those of many universities. They are necessary to ensure that students taken into programs have a reasonably good chance of completing these programs, rather than wasting their time or their money on inappropriate studies, and that they are able to progress in a way which will not disadvantage other students in the program. While it could be said that such regulations are discriminatory, they are clearly appropriate and are standard practice in higher education in Australia.

Tabor College Adelaide's non-academic entry regulations allow for more flexibility. While the College believes it is desirable that applicants are Christians, in line with the ethos of the College, this regulation, along with the other non-academic regulations, may be waived if the College considers that an applicant has a reasonable chance of completing the desired program successfully. At least some of the following entry regulations, cited from the College's Handbook, have been waived for at least 10% of current students:

For entry into a Tabor College course, an applicant is normally required to have:

- at least twelve months' experience as a committed Christian;
- a satisfactory interview with a faculty member; and
- a minister's reference endorsing the entry application.

However, the Faculty Committee reserves the right to waive any of the above entry requirements when it is satisfied that the ability, experience and spiritual standing of an applicant are sufficient to give the applicant a good chance of completing the desired course successfully. Additional criteria [i.e. academic criteria] depend on the desired level of study, as indicated below.

Tabor College Adelaide operates on the basis of a Christian worldview and ethos, and the large majority of its applicants are committed Christians. The nature of the College's programs and the fact that its primary purpose is to prepare Christians for life and work in the community means that non-Christians rarely seek admission. In the teacher education field, for instance, such people are unlikely to want to take programs which include not only the curriculum, education and elective studies needed for all teacher education students, but also an holistic Christian approach to character development, worldview, ethics, etc. Even as students preparing to teach English should be able to speak English, and students seeking entry to honours programs should be able to perform at the requisite level, we consider it is appropriate that students taking courses to prepare Christians for various forms of service in the community should be Christians.

Nevertheless, the College firmly espouses a non-discriminatory policy, as indicated by the following extract from Tabor College Adelaide's Policy on Justice, Equity and Legislative Requirements (Section 4.11 of the College's Manual of Policies and Procedures):

Tabor College is committed to the biblical principles of justice and equity. The College therefore seeks to ensure that students and staff are treated fairly and justly and without discrimination on the basis of gender, race, spiritual tradition, disability, age, social or economic circumstances, political persuasion, parent or carer status, or academic/ educational status. However, the College exercises the right to make decisions on entry to its courses and modules based on whether an applicant meets the prerequisites described in the *Tabor College Australia Handbook* and in the College's accredited curriculum documentation for these courses and modules.

The College seeks to provide education and training which assists students and graduates to strive for an ethical and just society, to be involved in addressing injustice, inequity and discrimination, and to work for a more just and equitable environment for all.

The College has a Christian ethos that encourages ethical practices, accountability and responsibility in all areas of its operations.

Tabor College Adelaide, as a multid denominational Christian Education centre, caters for the educational needs of students from a wide range of denominations, including all the major denominations (Anglican, Lutheran, Catholic, Uniting Church, Baptist, Churches of Christ, Pentecostal, Salvation Army, etc.). Although most students are from Protestant denominations, Catholic students are welcome at the College and there are some in the

current student body. The College also accepts students who either are not currently attached to a church or who have elected not to supply their church details to the College, with approximately 10% of students being in these categories.

It would seem unwise to assume that statistics that indicate a higher proportion of one category of students in a program than another necessarily indicate discrimination on behalf of the institution(s) offering the programs. For instance, if a certain program at an institution has older students and another younger students, or if different programs have different gender balances, the differences may well indicate that the programs cater for the educational needs of different client groups rather than any discriminatory entry policies on the part of the institution(s) concerned. In our own case, if we have more Christian students than does the average higher education institution, the reason, we suggest, is that we cater better for the specific needs of these students than does the average higher education institution.

Tabor College considers that current higher education funding inequities force it into a position that discriminates against individuals from disadvantaged socio-economic backgrounds. Tabor College Adelaide strongly desires to be able to offer its programs to individuals of all socio-economic and ethnic backgrounds. The total lack of government funding to date has severely restricted the College in this regard, as in order to operate the College must admit students who are able to pay full fees up-front. This creates a very unwelcome barrier for students from economically disadvantaged sectors of the community. The provision of funding would enable the College to operate without being forced to discriminate against potential students from lower socio-economic backgrounds.

Currently only students who have sufficient financial resources have the choice of either applying to Tabor College or to a State university for a teacher education course. This effectively removes the choice from students in lower socio-economic groups, who may wish to train to become teachers. Such students cannot select a course at a private unfunded institution, such as Tabor College, even if that course is designed to incorporate their specific educational and professional training needs. Their limited financial resources would make up-front fee payments impossible, even though teacher education tuition fees at our institution are under half of what full-fee-paying students in universities would pay for similar courses.

### **Public support for institutions catering for the needs of specific client groups**

It is of note that in recent years there has been considerable and growing public support for private, non-government primary and secondary education. The number of students in government schools increased by 31,309 between 1991 and 2001, while the number of school students outside the government system rose by 161,691. In 2001 there were 3,268,000 students in the government school system and 1,019,616 school students outside this system, i.e. 31.2% of all school students were outside the government school system.<sup>2</sup>

Private higher education is meeting the direct needs of a significant but smaller number of Australians than is private primary/secondary education. At the same time, private higher education is benefiting the whole Australian community, in most cases, at no cost to the taxpayer. Private higher education is used by stakeholders because of its recognised value. However, because of a lack of government funding in any form (student loans or institutional

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<sup>2</sup> AusStats: Education – National Summary Tables [a]; <http://www.abs.gov.au>; accessed 18.6.02.

subsidies), it is generally limited to those students who are able to pay full fees up-front. It is of particular concern to us that while the Government funds private schools (including Church and Christian-Independent schools) and also funds private Catholic higher education institutions that provide teacher education, it does not fund two higher education institutions that prepare teachers for the Protestant school sector of the community (Tabor College Adelaide and Christian Heritage College). Given that in the 1996 Australian census approximately 70% of Australians claimed affiliation to a Christian denomination and only 38% of these claimed to be Catholic, we consider that this situation should be reviewed, with a view to providing equitable access to funding for private non-Catholic teacher education programs.

## **ACCOUNTABILITY PROCESSES AND MECHANISMS**

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Tabor College agrees that a high level of accountability should be expected of any institutions offering accredited higher education courses. The College also believes that the accountability processes that have been established by government accrediting bodies, such as the Accreditation and Registration Council in South Australia in recent years ensure a high degree of accountability.

As a higher education institution, Tabor College recognises that it must demonstrate a high level of accountability to its various stakeholders and seeks to exercise this accountability at all times in a responsible and ethical manner. The College is accountable to the Accreditation and Registration Council (ARC) in South Australia to deliver the programs that it is registered to deliver in line with prescribed standards; it is accountable to its students who invest time and money to take its courses; it is accountable to its Board of Directors for efficient and effective use of income and resources, and effective delivery of programs; and it is accountable to the wider community which it serves by releasing graduates equipped to serve that community in ways that enhance community life and make a positive contribution to the well-being of the Commonwealth of Australia.

Because Tabor College Adelaide is registered as a private education provider operating in South Australia, the College undergoes audits, according to Accreditation and Registration Council policy. In 2001, Tabor College Adelaide was audited by a team of experienced auditors, with extensive university sector and auditing experience. The audit extended over a period of two months, culminating in an intensive on-site review by the auditing team. The Teacher Education and Distance Education Departments, along with College records, policies and management and planning, received particular scrutiny. The auditors' comments were very positive. Regular external audits, arranged by the Accreditation and Registration Council, are carried out in accordance with Accreditation and Registration Council policies. In addition, Tabor College undertakes a comprehensive annual internal audit and reports on this to the Accreditation and Registration Council. The audits required by the Accreditation and Registration Council cover all aspects of the College's operations (administration and records management procedures, access and equity and client service, stakeholder feedback, qualifications and competence of staff, delivery and assessment standards, compliance with government legislation and regulatory requirements, policies and procedures, financial management procedures, management systems and planning, etc.). Comprehensive documentation is on file in relation to all aspects covered.



## **COURSE ACCREDITATION AND RECOGNITION**

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Tabor College agrees that student loans and/or institutional subsidies should be provided only to institutions that offer sound and rigorously accredited programs.

Tabor College Adelaide offers undergraduate and postgraduate courses that have been developed by Tabor College to meet a need in the community and have been accredited by the Accreditation and Registration Council (ARC) in South Australia. The College has been registered to offer these programs in its own right by the same body. The Accreditation and Registration Council, as a State accrediting body, is subject to auditing by the Australian Universities Quality Agency (AUQA) and operates, we understand, within the framework of the National Protocols for Higher Education Approval Processes recommended by the Joint Committee on Higher Education and approved by the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA).

Higher education course accreditation granted by the Accreditation and Registration Council is granted on the basis of recommendations made by panels appointed by the Accreditation and Registration Council and made up of highly qualified personnel. For each round of accreditation (government accreditation for private institutions lasts only five years), these panels include relevant and highly qualified representatives from each of the State's universities, endorsed by each Vice Chancellor's Office, and professional representatives in relevant areas. For instance, panels for the accreditation of the Tabor College's Teacher Education courses have included a senior representative of the relevant faculty of each of the State's universities, and representatives of the Teachers Registration Board of South Australia, the Association of Independent Schools of South Australia, the Department of Education and Children's Services, and the South Australian Christian Schools Association. These panels have been required to assess the College's submissions for accreditation on the basis of the equivalence of the College's offerings to those of similar university courses.

Accreditation and Registration Council Assessment Panel members have clearly indicated, on a number of occasions, that they have been very impressed with the quality of the College's work. The Chair of a number of such panels, a man with considerable professorial experience at the Flinders University, commented that the quality of the College's curriculum documentation was of a standard that he had never seen exceeded and that the panels were overwhelmed with the thoroughness of the College's presentations. He also commented on the remarkable recommendations made by the staff of government and parochial schools regarding the teacher education provided by the College and the above average rate with which Tabor students were proceeding to higher degrees at mainstream universities. Late last year, he wrote to Minister Brendan Nelson, expressing these views. Following one Assessment Panel meeting, a member of the Teachers Registration Board of South Australia indicated that she was impressed by the quality of the College's Bachelor of Education curriculum documentation and asked if she could keep a copy. The Registrar of the Teachers Registration Board subsequently wrote to the College saying that the Board representatives on the panel had commented on the detail provided in the College's submission, its presentation and the way in which the process was handled, including the way the College had kept the Board informed during a long consultation process. (Her letter can be found on page 52 in the Appendices.)

Tabor College Adelaide's course accreditation and registration as a higher education provider cannot be applied nationally because it has been granted by the Accreditation and Registration Council in South Australia and therefore applies only within the jurisdiction of the Accreditation and Registration Council. Tabor Colleges in other Australian States are separately governed incorporated bodies and offer only such higher education programs as have been accredited and registered by the appropriate bodies in those States. Tabor College Adelaide is the only Tabor College approved to offer initial teacher education courses.

In addition to being endorsed through government accreditation, registration and auditing, the quality of the College's programs, the College's standards and its quality control mechanisms are evidenced in the recognition that is afforded to the College in the wider education community. Examples of this are seen in:

- Tabor College Adelaide students sharing practicum placement arrangements in public schools on an equal footing with students from public universities (see below);
- Tabor College graduate surveys, which indicate the high opinion graduates have of the education and pastoral care they received at Tabor College (see below);
- Tabor College graduate employment outcomes, which indicate the quality of the education provided by Tabor College Adelaide (see below);
- Tabor College's representation on the Professional Development Pathways Network Management Committee for postgraduate teacher education and professional development (see below);
- Tabor College being one of only two private higher education providers to be represented on the Higher Education Standing Committee in South Australia, which has strong representation from the university sector and the Education Department, and is endorsed by the Accreditation and Registration Council; and
- Various expressions of support from State and Federal Government politicians for the College's programs and standards and for its inclusion in the Higher Education Funding Act 1988. (For examples, see pages 18-19, 27, 28-29, 31-32, 50 in the Appendices.)

### **Practicum placements**

Tabor College Adelaide participates with the Schools of Education of Flinders University, the University of Adelaide, the University of South Australia and the Department of Education, Training and Employment (SA) in a partnership arrangement for the in-school practicum placements of teaching students from these four tertiary institutions. (See letter dated 23 August 2000 and statement signed by four representatives of the group, on pages 34-37 in the Appendices.)

### **Graduate surveys and graduate employment outcomes**

Tabor College's teaching graduates have a very high employment rate and are employed in Christian-Independent, Church and Government schools. The College receives outstanding reports from schools about many of its trainee teachers during their practicum placements. Feedback from graduates and employers indicates a high degree of satisfaction with the outcomes Tabor teacher education graduates have achieved.

## **Professional Development Pathways Network**

Along with the three State universities in South Australia, Tabor College Adelaide is represented on the Professional Development Pathways Network Management Committee, which is responsible for developing/approving new postgraduate coursework modules responsive to the continuing education and professional development needs of practising teachers. Tabor College's postgraduate programs in teacher education are recognised on an equal footing with those of the public university members of this network. (See Professional Pathways brochure on pages 38-39 in the Appendices.)

## **CAPACITY FOR RESEARCH AND UNIVERSITY TEACHING AND LEARNING**

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While private higher education institutions are likely to be considerably restricted in their research capacities, primarily because of a lack of access to government funding, this does not mean that they lack the necessary infrastructure for effective university teaching and learning. There is much more to effective university teaching and learning than the amount of research a teacher is undertaking. Active researchers are not necessarily the best teachers and vice versa. Institutions may have a very strong track record with regard to teaching and learning (as evidenced in graduate outcomes and career/study pathways) but may not necessarily be in a position to undertake a large amount of research. This may be less of a problem for institutions offering predominantly coursework programs.

Tabor College seeks to engage academic staff who are not only well qualified academically but who are also very competent teachers. Analysis of the results of student feedback in relation to teaching confirms that students consider the standard of teaching they experience at Tabor College to be of a high standard. Each teacher's performance is reviewed each semester for each course taught and action is taken, where necessary, to address any areas where improvement may be desirable.

Graduate outcomes provide evidence that graduates of Tabor College have benefited from high quality education and are successfully taking their place alongside graduates from universities in the work force and in postgraduate education. This further substantiates the fact that the College's teaching and learning is of university standard.

The Department of Education in South Australia and the Teachers Registration Board have on various occasions commended the College on the quality of its teaching graduates. In 2001, the Teachers Registration Board of South Australia, recognising the quality of Tabor College's teacher education programs, invited the College's Director of Education and a number of senior students to have input into research into the requirements for teacher registration in South Australia. In addition, Tabor College teaching graduates have been invited to submit comments to the Teachers Registration Board for inclusion in a publication.

Tabor College graduate outcomes in other disciplines also have provided evidence that high quality university teaching and learning takes place at Tabor College Adelaide. A proportion of graduates from the College's Counselling Graduate Diploma have pursued higher-level university studies, with excellent outcomes. A Tabor College bachelor

graduate in Counselling, when part-way through the Tabor College Graduate Diploma in the same discipline, and who was in the process of applying for entry into a Master of Health Sciences at the University of Nottingham wrote:

I was taken aback when we started talking, as he wanted to invite one of the other faculty members to the meeting on the basis that I was 'highly qualified and experienced'... Without exaggerating, they were very impressed with my background and with my studies at Tabor. Counselling is not available at degree level in the UK, only at diploma or MA levels. They were surprised that I was not aware how 'qualified' I was, but I explained that I was unaware as to how my experience and academic training compared to the UK for counsellors. Apparently I would be in some of the top categories of applicants for jobs, such as those in medical settings, which are rare positions in themselves.

In the theology field, several years ago, before Tabor College had been accredited to offer its own postgraduate theology courses, the Head of Theology at the Flinders University of South Australia wrote:

I have observed with interest what has happened to Tabor College graduates who have applied for entry into postgraduate courses at this University in recent years. A number have applied and, to my knowledge, all have been accepted. Without exception, they are performing extremely well. Earlier this year, one of these graduates received a Chancellor's letter of commendation for excellent performance in the Bachelor of Theology (Hons). This is added confirmation for me that the undergraduate program currently offered at Tabor College is of a high academic standard, which is certainly equivalent to that in similar disciplines in State universities.

(Full letter provided on pages 16-17 in the Appendices.)

Private higher education institutions are likely to be limited in their capacity to engage in research by virtue of a lack of government funding, resulting in a lack of faculty time and a lack of resources to be devoted to research. This is particularly likely to be a difficulty in relation to labour-intensive disciplines like teacher education. Even in funded settings, faculty in teacher education often find limited time for research because of the labour-intensive nature of providing teacher education.<sup>3</sup> Nevertheless, educators in private higher education institutions are likely to be creative, energetic and resourceful people, who will seek to find ways to pursue relevant cutting-edge research interests despite constraints imposed by limited time and resources. A Teacher Education faculty member at Tabor College Adelaide, for instance, has recently been pursuing research into teacher formation/development, with resulting conference presentations and publications aimed at the Christian teacher education sector. Proposals are being developed to pursue this research interest with regard to teacher formation in disadvantaged settings. Another faculty member has been pursuing research on educating children with special needs and another on Attention Deficit Hyperactivity Disorder. Our institution is keen to increase its research activities but is significantly restricted in this regard by the enormous fiscal constraints under which it operates.

We would consider it inequitable if funding should be denied to private higher education institutions, or loans to be denied to their coursework students, because these institutions may lack an extensive research profile, when the lack of government funding, itself, significantly hinders the development of such a profile.

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<sup>3</sup> Zeichner, K. "The new scholarship in teacher education". *Educational Researcher* 28(9) (Dec 1999).

## CONCLUDING SUMMARY

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In this submission, after providing background details about Tabor College Adelaide, we have addressed specific issues to be considered by the Senate Committee: selection criteria, access and public support; accountability processes and mechanisms; course accreditation and recognition; and capacity for research and university teaching and learning, in relation to Tabor College Adelaide. In doing so, we have provided evidence of the College's high standing as a higher education institution, and we have explained why we believe that Tabor College Adelaide and Christian Heritage College should be granted HECS placements for their initial teacher education courses, according to an established precedent, as well as PELS being made available for postgraduate coursework students of these institutions.

Dennis Slape, Executive Director, Tabor College Adelaide  
Lorraine Beard, Curriculum Coordinator, Tabor College Adelaide  
24 July 2002  
*On behalf of the Board and Staff of Tabor College Adelaide*

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# TABOR COLLEGE ADELAIDE

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