



**Submission in response to
to the
Review of the National School Reform
Agreement Interim Report**

24 October 2022

Correna Haythorpe
Federal President

Kevin Bates
Federal Secretary

Australian Education Union
Ground Floor, 120 Clarendon Street
Southbank Vic 3006
PO Box 1158
South Melbourne Vic 3205

Telephone: +61 (0)3 9693 1800
Facsimile: +61 (0)3 9693 1805
Web: www.aeufederal.org.au
E-mail: aeu@aeufederal.org.au

Australian Education Union

Submission in response

to the

Review of the National School Reform

Agreement Interim Report

Introduction

The Australian Education Union (AEU) represents over 198,000 members employed in the public primary, secondary, early childhood and TAFE sectors throughout Australia. This submission is made on behalf of AEU members across the country in response to the recommendations and information requests made by the Productivity Commission in its Interim Report.

The AEU notes that the key points presented at page 2 of the Interim Report state that “Public interest in schools reform has increased over the life of the National School Reform Agreement (NSRA), spurred in part by concerns that, despite the large increase in public funding since 2018, student outcomes have stagnated.”¹ As detailed at length in the AEU’s original submission to this review, which we would like to reiterate here, the “large increase in public funding since 2018” has not been fairly or equitably distributed. In practice, the promised needs-based, sector-blind model that incorporates full funding of the SRS and is essential for fairness and equality of opportunity in education has not been implemented under the NSRA.

In fact, the failure of the Commonwealth and State and Territory governments to meet the minimum funding standard means that on average every public school in Australia will miss out on at least \$1600 in funding each year to 2023 - a minimum of \$6,500 per student across the country from the start of the National School Reform Agreement to its conclusion in 2023.² At the same time, private schools have benefitted enormously from the scheduled decade long transition to the Direct Measure of Income that allocated an additional \$3.4 billion to private schools, taking those schools to almost \$1 billion in additional recurrent funds above their full SRS amount, the \$1.2 billion Choice and Affordability Fund, the \$1.9 billion private schools only Commonwealth Capital Works Fund and many other sources of current and planned additional commonwealth funding available only to private schools – totalling \$10 billion of planned additional expenditure over the decade from 2017.³

¹ Productivity Commission 2022, Review of the National School Reform Agreement, Interim Report, Canberra, September, p.2

² Morris, A, *The Schooling resource Standard in Australia: Impacts on Public Schools*, 2020, p.9.

³ Morris, A. *Scott Morrison’s record on school funding: \$6.5 billion every year in public school neglect & \$10 billion in private school cash handouts*, 2022, retrieved from https://www.aeufederal.org.au/application/files/1116/5104/1199/AEU216_Morrison_Funding_Report.pdf

The 2022 Report on Government Services shows that from 2010-11 to 2019-20 total recurrent spending per student in public schools has increased by 16.0%, while private school per student government funding has increased by 40.3% - 2.5 times the rate of the public-school increase.⁴ The AEU reiterates the fact that the Terms of Reference issued to the Productivity Commission by the previous federal government constrained the consideration of issues relating to school funding. The AEU again strongly urges the Productivity Commission to consider the impact of the entrenched recurrent funding shortfall on the ability of public schools to comply with the Reform Directions and NPIs set out in the NSRA, as well as their ability to ensure ongoing staffing and resources for the delivery of intensive learning and support programs for students. We also urge the Productivity Commission to give due consideration to how “the large increase in public funding since 2018” has been distributed between the public and private school sectors.

AEU response to Information Requests

Information request 3.1

Intensive, targeted support for students who have fallen behind

Would programs that provide intensive, targeted support to students who have fallen behind lend themselves to being a national policy initiative under the next intergovernmental agreement on schools?

The vast inequity in the way that Commonwealth and State/Territory Governments distribute funding to schools means that many students are not provided with the additional resources required to enable them to overcome their disadvantage, resulting in an increasingly wide gap in achievement between students from advantaged and disadvantaged backgrounds. The impact of this lack of support is plainly evident in the achievement gaps shown in Chapter 3 of the interim report.

These gaps, if not addressed early and with sufficient resourcing, can have lifelong limiting consequences for students. The OECD has reported that around 20% of Australians perform below Level 2 in numeracy, which indicates struggle with the numerical reasoning needed to complete everyday tasks. They also note that while many other countries also do better in literacy than in numeracy, the difference between literacy and numeracy scores is not nearly as significant as in Australia. In Australia, 13% of adults with higher literacy skills (Level 2 and above) perform poorly in numeracy, compared to 10% among participating countries. Underperformance in numeracy is observed in Australia across all age groups, including young people (16-24 year-olds), and across all levels of educational attainment. For example, 7% of all tertiary graduates have low numeracy skills compared to 3% with low literacy skills.⁵

Further, the OECD also notes that Australia has considerably greater inequalities in the distribution of numeracy scores and displays large gaps between the lowest and the highest performers. In Australia, 182 points separate the highest and the lowest 5% of performers in numeracy, far above the participating country average of 167 score points. The United States is the only other country with a wider gap between the lowest and the highest performers.⁶

⁴ Productivity Commission, *Report on Government Service 2022: 4 School Education*, Tables 4A.10 and 4A.13. User Cost of Capital removed from public school funding to ensure like for like comparison with private schools

⁵ OECD, *Building Skills for All in Australia Policy Insights from the Survey of Adult Skills*, p. 46

⁶ OECD, *Ibid.* p.46

Programs to provide intensive and targeted support to students who need it are very welcome. However, they must include ongoing resource that is built in as a regular component of schooling through the provision of smaller class sizes and additional in class learning support, rather than provided as short-term additional tutoring programs conducted outside of school hours. Australian students already have compulsory institution time well above the OECD average and above the average in comparator countries. Total compulsory instruction time for an Australian primary school student is 6998 hours per year, compared to a primary student in the USA (5837 hours), the OECD average (4590 hours) and EU22 average (4189 hours). Total compulsory instruction time for an Australian lower secondary school student is 4062 hours, compared to a primary student in the USA (3066 hours), the OECD average (3049 hours) and EU22 average (3024 hours).⁷

Additional support will be most effective and most sustainable in the form of additional teacher support staff in the classroom, smaller classes and a reduction in the administrative and compliance burden placed on teachers.

Draft finding 3.1 states that:

*Most underperforming students do not belong to the priority cohorts named by the National School Reform Agreement. Around 85 per cent of these students do not belong to any of the priority equity cohorts identified in the National School Reform Agreement. Low educational performance needs a different approach.*⁸

The emphasis of this finding on students who do not belong to the priority equity cohorts measured in NAPLAN testing is curious, as it ignores the fact that most underperforming students do not belong to the priority cohorts because most students do not belong to the priority cohorts. When the raw numbers included in the Venn diagram on page 81 of the Interim Report are analysed proportionally it becomes apparent that students from priority cohorts are more than twice overrepresented among those not meeting minimum standards in literacy and numeracy (15% vs. 7%).

For students in priority cohorts who do require additional and intensive support outside of the classroom, the following are recommended to the Commission by AEU Branches and Associated Bodies.

The AEU Northern Territory Branch recommends that students who are required to be withdrawn from class for intensive support are offered special re-engagement classes or programs, including ones operating outside of traditional school structures, such as ‘bush schools’ for non-attending students operating the Northern Territory operated by schools such as the bi-lingual Shepherdson College.

⁷ OECD, *Education at a glance: 2021 indicators*, Table D1.1. Instruction time in compulsory general education

⁸ Productivity Commission 2022, *Review of the National School Reform Agreement, Interim Report*, Canberra, September, p.82

The Queensland Teachers Union branch of the AEU recommends that the next NSRA establish a series of Positive Learning Centres for students in rural and regional locations for students who have disengaged. These Positive learning centres should deliver long-term programs (10 weeks or longer) with the aim of providing students with sufficient skills to return to mainstream schooling. Where this is not feasible, the positive learning centre should build lifelong learning capacity and support the student to find a place in the workforce or access education via a school of distance education or alternative education settings. The focus of the positive learning centres should be to provide literacy and numeracy support, and to build interpersonal skills (tolerance, anger management, teamwork) and intrapersonal skills (self-reflection, goal setting, resilience).

Information request 3.2

Priority equity cohorts for the next agreement

Are there student cohorts, not identified as a priority equity cohort in the current National School Reform Agreement, such as children in out of home care that should be a priority in the next agreement? If so, which cohorts and why?

Associate Professor Rachel Wilson makes the compelling argument that education systems cannot achieve what they do not measure, which is why governments have not prioritised equity in schooling despite it being rhetorically endorsed in numerous education declarations over the last two decades from the Hobart Declaration in 1989 to the Alice Springs (Mparntwe) Declaration in 2019.⁹

For this reason, the AEU encourages further equity cohorts being identified and included in the monitoring of the next NSRA.

The AEU supports the inclusion of children in out of home care as a priority cohort in the next NSRA.

The AEU also recommends that students who are the children of, or who themselves are, a holder of a Temporary Protection Visa, Safe Haven Enterprise, Humanitarian Stay Visa, or Bridging Visa should be considered an identified priority equity cohort in a revised NSRA. Public services, including education, should be adequately funded to provide the necessary services to this cohort, which include but are not limited to intense support resourcing, English language support, school-based trauma informed practices.

It is important to recognise, however, that for priority equity cohorts including children in out of home care and for refugee children and from refugee backgrounds, that there are many factors beyond school that affect performance in standardised testing. It cannot be the responsibility just of the public school system to affect change in this regard – we need improved and holistic social service provision including healthcare and housing support.

The AEU also supports the Commission's suggestion of making students with English as an additional language or dialect an additional priority equity cohort, and this is detailed in our response to information request 3.5.

⁹Wilson, R. Presentation available at <https://static1.squarespace.com/static/60d14074f91b5b0fddfa9652/t/6216c780ebd92262f0eee2d6/1645660045419/Rachel+Wilson+Excellence+and+Equity+-+PowerPoint.pdf>

Information request 3.3

Implementation plans

- 1. What would be the costs, benefits, and implementation issues associated with the Commission’s proposed enhanced accountability mechanisms (draft recommendation 3.1) for bilateral agreements and associated reporting arrangements (in general and as they relate to students in priority equity cohorts)? What would be the costs and benefits of having people with lived experience involved in shared decision making in relation to reporting arrangements?**
- 2. Are there ways parties could reduce the costs (for example, reporting burdens) and increase the benefits of implementation plans by integrating, aligning or linking them with existing government reporting processes (for example, reporting under Closing the Gap and Australia’s Disability Strategy)?**

The AEU contends that implementation plans embed a bureaucratic approach to education, broadly captured by Professor Pasi Sahlberg’s notion of the Global Education Reform Movement (GERM).¹⁰ This notion diminishes education through the use of corporate management models as a main driver of improvement. The movement adopts standardisation, low-risk pedagogy, and test-based accountability policies, but is in stark contrast to the success of education systems, such as in Finland, which is founded on high confidence in the professionalism of teachers and principals to try new ideas and approaches, cultivate the development of whole child.

Implementation plans will create additional work for school leaders and that will further erode their professional autonomy. Moreover, there is no benefit in an implementation plan that will require teachers to generate ever more data¹¹ that erodes trust in teachers.¹²

A significant cost of the introduction of additional and new implementation plans would be an inevitable commensurate increase in onerous compliance measures required of teachers. Multiple studies, including AISTL’s Australian Teacher Workforce Data survey have found that the amount of compliance administration required is one of the main contributing factors to escalations in non-core teacher work.

¹⁰ Sahlberg, P. (2016). The global educational reform movement and its impact on schooling. In K. Mundy, A. Green, B. Lingard, A. Verger (Eds.). *The Handbook of Global Education Policy* (pp.128-144). DOI:10.1002/9781118468005.

¹¹ Clutterbuck, J., Daliri-Ngametua, R. (2021). How to recognise an attack of the zombie (data). *EduResearch Matters* <https://www.aare.edu.au/blog/?p=11244>

¹² Daliri-Ngametua, R., Hardie, I., Creagh, S. (2021). Data, performativity and the erosion of trust in teachers. *Cambridge Journal of Education* 52(3) pp. 391-407. doi.org/10.1080/0305764X.2021.2002811

The Alice Springs (*Mparntwe*) *Education Declaration*¹³ establishes the education goals for young Australian which includes equity and excellence, and the declaration outlines an action plan which includes a commitment to a biennial forum that show cases best practice, success stories, and progress against the goals outlined in the Declaration, and the AEU recommends that this forum is adopted, with increased participation from the teaching profession, as the primary measure of implementation effectiveness.

Information request 3.4

Transparency of funding for students from priority equity cohorts

What would be the benefits, costs and risks of greater national reporting of schools funding and expenditure data to support transparency around state and territory efforts to lift outcomes for students from priority equity cohorts? If there is a case for providing such information, how could it be collected cost effectively?

In 2017 the Auditor-General conducted an audit of Australian Government funding for schools. The report focused on how government funding to private school Non-Government Representative Bodies was allocated.

Auditor-General Report No.18 2017–18 found that the Department of Education and Training did not have a sufficient level of assurance that Australian Government school funding had been used in accordance with the legislative framework, in particular the requirement for funding to be distributed to schools on the basis of need.¹⁴

A 2021 follow up report follow up report found that:

- A robust risk-based approach to monitoring compliance with school funding legislated requirements is in place, but transparency requirements are not yet effectively supported.
- There are limitations in the department's ability to measure the impact of school funding on educational outcomes

And concluded that:

- The department's administration of legislated requirements to gain assurance that funding has been allocated, used and distributed in accordance with the requirements is partially effective.
- The department does not yet effectively support the transparency of Australian Government funding allocation and does not analyse school funding allocation data to ensure that funding is distributed in accordance with need.
- The department's approach to assessing the impact of school funding on educational outcomes is not fully effective.

¹³ Australian Government. (2019). Alice Springs (*Mparntwe*) *Education Declaration*, retrieved from <https://www.education.gov.au/download/4816/alice-springs-mparntwe-education-declaration/7180/alice-springs-mparntwe-education-declaration/pdf/en>

¹⁴ ANAO Report No.18 2017–18 *Monitoring the Impact of Australian Government School Funding*, retrieved from https://www.anao.gov.au/sites/default/files/ANAO_Report_2017-2018_18a.pdf

- The department does not yet effectively support the transparency of Australian Government funding allocations as prescribed in the Act and since 2018 has not completed work to ensure that funding distributed by system authorities is in accordance with the Act.
- The department does not ensure that the legislative requirement to report publicly on the application of any financial assistance paid to an approved authority is met
- The department does not always ensure that Non-Government Representative Bodies. (NGRBs) which allocate public funding to the private schools sector fulfil their transparency requirements.

The National School Resourcing Board has recently also made strong comments on the lack of transparency in school funding to approved authorities.¹⁵

Additionally, and importantly, much greater attention needs to be paid to the impact from the bi-lateral agreements from governments not meeting the full SRS on all equity measures for priority student cohorts. A prime example of this deficit is the allocation of the disability loading. AEU analysis of data provided at Senate Estimates shows that failure to fund public schools to 100% of the SRS means that nationally in 2021 the 399,336 students in receipt of a disability loading received \$601.2 million less in disability loadings than they should have that year. The largest shortfalls were in the states with the largest student populations:

- In NSW 144,225 students with disability who qualified for loadings were short changed \$180.7 million due to NSW not meeting its minimum SRS requirements.
- In Victoria 97,223 students with disability who qualified for loadings were short changed \$204.2 million due to Victoria not meeting its minimum SRS requirements.
- In Queensland 72,897 students with disability who qualified for loading were short changed \$128.2 million due to Queensland not meeting its minimum SRS requirements.

This inequity for students with disability who qualify for loadings is entrenched in the bi-lateral agreements until at least 2027 (and to 2032 in Queensland) and can only be rectified by ensuring that the shared responsibility of the Commonwealth and States/Territory governments is guaranteed in the next agreement.

A further and significant issue with the resourcing of disability loadings for students in public schools is that many public school teachers and leaders do not have the required resources or time available to them to engage in the repeated assessment and application processes necessary to ensure that their students receive their proper loading. This issue was raised by Department of Education, Skills and Employment officials in the 2022/23 Budget Estimates Hearings:

[W]e saw that government schools were slower to respond to some of the issues for picking up students with disability and providing certain kinds of support for students with disability. So their loading was not increasing as much during that time, whereas, for the non-government sector, we saw quite a strong response to identifying and providing the supports for students with disability. So that's just an example of how one loading is quite different between the government and the non-government sector. If you look at the funding there in

¹⁵ Heffernan, M, *Monitor calls for greater school funding transparency*, The Age , 6/10/2022, retrieved from <https://www.theage.com.au/national/victoria/monitor-calls-for-greater-school-funding-transparency-20220930-p5bm9e.html>

*terms of disability, you see that the non-government sector was responding in 2020 and 2021 with shifts of nine percentage each per annum, in terms of those disability loadings, whereas the government sector was much slower to respond.*¹⁶

This gap between school sectors is also borne out by the change in the percentage of students in receipt of funded disability loadings by school sector, particularly in recent years. From 2015 to 2021 the percentage of students in independent schools who receive the supplementary disability loading has increased from 6.9% to 8.4% and in Catholic schools it has increased from 8.6% to 10.5%. In public schools the increase has been much lower, from 8.3% to 9.0%. Similarly, the percentage of Catholic school student in receipt of the substantial loading has increased from 1.7% to 3.6% and for independent schools it has increased from 2.0% to 2.6%. Over the same time period the percentage of public school students in receipt of the substantial loading has increased only from 3.4% to 3.9%.¹⁷ These figures suggest that there are significant numbers of students with disability in public schools who are not in receipt of a disability adjustment or are not in receipt of the correct level of adjustment and thus missing out on necessary support. Indeed, the AEU has had numerous reports from AEU Branches and Associated Bodies (in particular from New South Wales, Victoria and Tasmania) that this is the case.

School systems have ultimate authority for ensuring that students within priority equity cohorts have access to the support that they need to participate in education on the same basis as students who are not in those cohorts, but it is the responsibility of governments who administer and fund these systems to ensure that schools have the resources necessary to support all students. It is also the responsibility of governments to ensure that schools have enough resources and the capacity to complete the administrative and bureaucratic requirements that the system demands.

As the results above show, too often the responsibility for ensuring that students receive the support they require falls to teachers and principals rather than on the authorities which manage school systems and the State, Territory and Commonwealth Governments that fund them. The AEU recommends to the Commission that it must be a priority to ensure that all schools systems have the resource and staff capacity required to ensure that all students are able to access the level of support appropriate to their needs.

Very importantly, this increased transparency must not result in even greater demands for compliance monitoring on teachers or school leaders, but must ensure that approved authorities and NGRBs improve the timeliness and accessibility of the data that they provide to the Department of Education, and that the Department in turn publishes that information in a timely and accessible way. Currently this data is only available in an appendix to the Australian Government Schools Funding Report and presented as a dollar amount with no reference to whether governments have met their obligations to students in priority cohorts in relation to the SRS.

¹⁶ Senate Education and Employment Legislation Committee, retrieved from https://parlinfo.aph.gov.au/parlInfo/download/committees/estimate/25685/toc_pdf/Education%20and%20Employment%20Legislation%20Committee_2022_04_01.pdf;fileType=application%2Fpdf#search=%22education%20and%20employment%22 p.68

¹⁷ Australian Curriculum Assessment and Reporting Authority, *Students with Disability*, retrieved from <https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/national-report-on-schooling-in-australia-data-portal/school-students-with-disability>

The AEU recommends to the Commission that all SRS loading data is made accessibly available and is reported against the full SRS loading amount. The AEU also recommends that approved authorities are required to report the allocation of actual SRS loading funding to individual schools against each school's entitlement.

Information request 3.5

Embedding the perspectives of priority equity cohorts in national education policy and institutions

- 1. What specifically could be done to embed the views of priority equity cohorts in national education policies and institutions, including outcomes, targets and policy initiatives in the next intergovernmental agreement on school education?**
- 2. What are the merits of establishing a national Indigenous consultative body on education? How might such a body be structured? If pursued, would this best occur through a successor national school reform agreement or some other avenue?**
- 3. Does the current education and research evidence base capture a representative range of cultural and community perspectives, including those of Aboriginal and Torres Strait Islander students, teachers and researchers? If not, what actions could be taken to support this?**

The 5th National Aboriginal and Torres Strait Islander Education Conference (NATSIEC) in 2018 made numerous recommendations that are very relevant to this review, which the AEU recommends, including the establishment of a community-led independent Aboriginal and Torres Strait Islander Education Institute to identify and promote evidence and best practice and the monitoring of the integrity and effectiveness of Indigenous education policy and practice. In particular, NATSIEC emphasised that Indigenous youth must be afforded a significant voice in education policy and delivery that impacts on the lives of young people. NATSIEC also recommended the re-instatement and continuity of funding for Indigenous Education Consultative Bodies in all jurisdictions as the primary means for community voices to be heard in Aboriginal and Torres Strait Islander education policy and delivery.

The AEU endorses all these recommendations from NATSIEC in relation to information request 3.5 and makes the following additional recommendations in relation to ensuring that the perspectives of Aboriginal and Torres Strait Islander students and teachers are embedded in the next NSRA:

- That a comprehensive Aboriginal and Torres Strait Islander teaching workforce strategy is instated, that builds on the outcomes of the More Aboriginal and Torres Strait Islander Teachers Initiative (MATSTI).
- That all schools should explicitly state a policy of zero tolerance to racism from staff and students.
- That state and territory Departments of Education provide resources and the time needed to enable all teachers to undertake annual or (at a minimum) biennial professional development studies in cultural competency.
- That ITE must include mandatory units in cultural competency throughout all years of study.

- That protocols are developed for the teaching of Aboriginal and Torres Strait Islander histories and cultures that include when permission needs to be requested from elders.
- That the accreditation of Highly Accomplished and Lead Teachers recognise the specific pedagogical and cultural experience of Aboriginal and Torres Strait Islander teachers and career pathways are introduced which recognise this expertise.

The next NSRA should also consider the importance and benefits of language learning in Indigenous communities, particularly the role of bilingualism in education and Indigenous languages in assisting student learning, which has been validated by well-established national and international research and documented in previous submissions to government inquiries.

UNESCO's 'Global Monitoring Report on Education for All, 2010', states: The degree of alignment between home and school language has a critical bearing on learning opportunities and on future literacy. Children who study in their mother tongue usually learn better and faster than children studying in second languages (UNESCO Bangkok, 2008; Woldemikael, 2003). Pupils who start learning in their home language also perform better in tests taken in the official language of instruction later in their school careers (UNESCO Bangkok, 2008). The benefits extend beyond cognitive skills to enhanced self-confidence, self-esteem and classroom participation (Alidou et al., 2006).¹⁸

In Australia, a 2008 report by the Australian Council for Educational Research, 'Indigenous language programs in Australian schools – a way forward', identified a growing body of research evidence showing that well-designed bilingual programs are academically effective and do not hold back students' acquisition of English. Research suggests that if literacy is established in a child's first language, it is easier to switch to another language. Research also suggests that childhood bilingualism enhances cognitive ability by promoting classification skills, concept formation, analogical reasoning, visual-spatial skills and creativity gains and has shown that young children learn best when taught through their mother tongue.¹⁹

The research has also shown that there are positive effects on children's cognitive development if they are encouraged to become strong bilinguals. They note also that policy-makers seem to fail to recognise that children who are monolingual in a language other than English need explicit teaching of the English language, by trained English as a Second Language (ESL) or English as a Foreign Language (EFL) teachers, before they can learn through English as the medium of instruction.²⁰

Children who are first educated at school in their own language have a capacity for learning English when introduced at around the age of eight years which is significantly better than for those children who were not taught in their own language and who are expected to learn English at school entry.

Bilingual education is not only beneficial to students' education, it is valued by local communities because it ensures the survival of languages and because it provides an honoured place for Indigenous languages in the curriculum and an honoured place for Indigenous teachers. The teaching and maintenance of Indigenous languages in schools is essential to maintain culture. It

¹⁸Stronger Smarter Institute (2015) Submission to House of Representatives Standing Committee on Indigenous Affairs, Inquiry into Educational Opportunities for Aboriginal and Torres Strait Islander students.

¹⁹ Purdie, N. (2009). A way forward for Indigenous languages. Australian Council for Educational Research. Research Developments Volume 21

²⁰ Simpson, J, Caffery, J. and McConvell, P., *AIATSIS Discussion Paper Number 24*, retrieved from <http://www.aiatsis.gov.au/research/docs/dp/DP24.pdf>

shows that schools acknowledge and respect the value of the child's language and culture, and thus the child's Indigenous identity. This requires a level of action that goes beyond 'recognising' the importance of language teaching and 'acknowledging' the degree to which Indigenous languages being spoken today are in real danger of dying out in the absence of funded and resourced implementation of the measures that have been shown to work from the existing numerous studies and reports.

The AEU supports the maintenance and revitalisation of Aboriginal and Torres Strait Islander languages and recommends that the Commission support bilingualism. Enabling Indigenous children to be strong in their own cultures and languages plays a significant role in ensuring high mainstream educational outcomes, including fluency in Standard Australian English. Students who have an Indigenous language or dialect as their first, second or third language should attract appropriate ESL support and funding and including well-resourced, appropriately staffed bilingual education programs, where communities choose to support bilingual programs in local schools.

The AEU supports the Commission's suggestion of making students with English as an additional language or dialect an additional priority equity cohort. Many students, particularly in remote communities, live in communities where English is spoken little outside of school, and therefore have little exposure to English. They share a language other than English with most of their classmates and school staff, their parents and other family members may have limited English and/or limited literacy, and literacy may not be embedded as a cultural practice within the community, and they have little opportunity or incentive to speak English even at school, other than with their teacher.

The AEU recommends including a focus on these students as a priority cohort and the benefits of bilingual education for First Nations students in the next NSRA.

Information request 4.1

Should there be National Policy Initiatives to improve student wellbeing?

- 1. Are there common steps that the Australian, State and Territory Governments could take in the next intergovernmental agreement to improve student wellbeing, or programs that could be implemented nationally?**
- 2. Is knowledge in recognising and responding to poor wellbeing and trauma sufficiently covered in Initial Teacher Education and Teacher Performance Assessments? If not, how might this be improved?**

Student wellbeing, mental health and the impact of trauma is a significant and growing issue for schools, and has been exacerbated by the difficulties of students and school staff in dealing with both the short and long term challenges presented by COVID-19. The impact is evident in the results of the AEU's 2021 *State of Our Schools* survey of public school principals. Although principals considered themselves able to deal with most wellbeing and mental health challenges in a positive manner overall, six of the seven areas where principals responses reveal the most difficulty are those that relate directly to vulnerable students – being able to provide ongoing learning support for students with additional needs, providing ongoing learning support for students with disability, pastoral care for vulnerable students, maintaining student engagement and supporting student's mental health.

65% of principals said they have noticed a decline in student wellbeing in the last 18 months (17% noted a significant decline and 48% noted some decline) and this rises to 71% in school described as under resourced by the principal.

66% said they have noticed a decline in student engagement in the last 18 months (18% significant decline and 48% some decline) Additionally, under resourced schools have had three times the level of significant decline in engagement that adequately resourced schools have had (26% vs 8%).

The AEU welcomes the Federal Government's decision to amend the school chaplaincy program to allow schools to hire pastoral care workers and counsellors who are not religiously affiliated and recommends that an ideal approach to student wellbeing would be a 'wraparound' model of service provision that is already operating in some limited cases, particularly in the ACT.

The most significant factor affecting student learning outcomes is their socioeconomic status. Despite the transformative power of public education, the evidence is clear that education alone is insufficient to address structural economic inequality. It must be supported through proper provision of social welfare and public services. As stated in the ACT Government Education Directorate's own ten year strategy, The Future of Education:

A holistic view of students as people recognises that basic welfare and wellbeing needs, things like nutritious food and physical and mental health support, provide the basis on which learning can occur. Meeting these needs allows the full opportunity of education to be made available.⁹

School leaders have consistently expressed frustration to the AEU at the thresholds set by support services before they will become involved. In particular, one school reported being advised by Child and Youth Protection Services that they would not become involved in a serious and escalating mental health crisis because the student involved was not suicidal and that they expected the school to provide mental health crisis support.

The impact on teaching quality from these circumstances is significant. Staff in all roles in schools are often required to devote significant additional time and resources to meet the needs of their students and their families. Schools are currently called on to devote additional time and resources to attempting to find ways to provide support to students' families that are well outside of any educational role. With limited time and resources, schools are forced to choose between ensuring wellbeing and the work required to implement the best quality teaching.

School staff are often required through necessity to take on huge additional pastoral care burdens including:

- Finding housing for students and their families;
- Providing legal assistance;
- Advising on the availability of welfare payments and assisting students and their families to apply;
- Providing mental health crisis support;
- Providing financial support to parents; and
- Feeding and clothing students.

These demands cause considerable health mental impacts for educators who find themselves undertaking mental health crisis work and de facto social work with no training or support. These educators often sustain serious psychological injury as a result of this unsafe work, compounding the issues of staffing shortages.

There are and should be limits to what teachers are required to do to support students.

The AEU recommends that the next NSRA require that State and Territory governments develop whole of government plans to lift all school age children out of poverty and housing insecurity, two of the main drivers of poor wellbeing among public school students.

The AEU also recommends that next NSRA recognises that a substantial increase in resource for student wellbeing and pastoral care is required, and that in addition to allowing non-religious pastoral care workers to access funding previously ring-fenced under the National School Chaplaincy Program the Commonwealth, State and Territory governments should work collaboratively to increase funding for pastoral care workers and school counsellors.

Information request 5.1

Teaching Performance Assessment

- 1. Does the Teaching Performance Assessment (TPA) process ensure pre-service teachers are sufficiently classroom ready?**
- 2. Should TPAs meet a national minimum standard? If so, how might this be achieved?**
- 3. Do TPAs ensure that pre-service teachers are well placed to respond to the needs of students from priority equity cohorts? If not, how might this be improved, and what trade-offs might this involve?**

The OECD report *Effective Teacher Policies: Insights from PISA* states unequivocally that the “quality of an education system depends on the quality of its teachers; but the quality of teachers cannot exceed the quality of the policies that shape their work environment in school and that guide their selection, recruitment and development.”²¹ The AEU is committed to the pursuit of higher standards in all facets of public education, and has consistently advocated for the application of uniformly high standards for the qualifications, induction and ongoing professional learning for teachers. The maintenance, and where necessary, the introduction of high standards in teacher education, including the Teaching Performance Assessment (TPA), is essential to protect and enhance the status of the teaching profession.

Many students are entering teacher education ill-prepared and completion rates show that many struggle to finish their degrees.²² Universities have a responsibility to ensure their students have every opportunity to successfully complete their course, but they also have a responsibility to ensure that high standards are maintained. This is particularly relevant for courses such as undergraduate ITE where large and increasing numbers of entrants begin their enrolment without disclosing their prior academic history which limits the ability of universities to identify where there is an increased need for assistance and to provide appropriate support.

²¹ OECD (2018), *Effective Teacher Policies: Insights from PISA*, PISA, OECD Publishing, Paris, <https://doi.org/10.1787/9789264301603-en> .p.20

²² *Ibid.*

In addition to improving and ensuring that TPAs meet a national minimum standard, the next NSRA must ensure that all modes of ITE delivery are sufficiently rigorous in their entry and completion standards, and that students are enrolled in a form of ITE that continues to challenge and engage them throughout their course. From 2009 to 2019 total ITE commencements have increased by 4% whilst ITE completions have declined by 5%. At the same time, there has been substantial growth in the proportion of ITE students studying either partially or wholly online. The AITSL National Teacher Education Pipeline Report shows that enrolment in online ITE courses has grown significantly since 2006 and that by 2016 19% of enrolled students were undertaking part of their studies online and 25% of students were studying their ITE programs entirely online.²³ It also shows that those who studied externally via online programs only had the lowest completion rates, both for undergraduates (27%) and for postgraduates (59%). This is highly inefficient, serving neither the interest of the entire economy in terms of workforce planning, nor the interests of candidates who are ill-suited to teaching when they could be pursuing alternative career pathways. For this reason the AEU is very concerned about the continuing efforts of some providers to normalise online training as the primary mode of ITE delivery and about the impact of the workplace readiness of some pre-service teachers who undertake online ITE.

Rigorous entry requirements focused on recruitment of the top 30% of school graduates, a strengthened TPA and robust workforce planning to meet future demand, must be urgently introduced to ensure a stable and steady supply of teachers into Australia's schools.

In the AEU's 2021 State of Our Schools survey a third of all early career teachers said that their ITE did not prepare them well for the classroom, rising to 50% in outer regional schools and 46% in remote schools. The main areas identified as lacking were:

- Teaching students whose first language is not English (64%)
- Dealing with difficult behaviour (60%)
- Teaching students with disability (49%)
- Teaching Aboriginal and Torres Strait Islander students (42%, 48% in remote schools)

Just over half (56%) of early career teachers received an orientation or induction program designed for new educators and 71% had a designated mentor, although this was much lower for casually employed new educators, at 31%. 56% of permanent early career teachers had a reduced face to face teaching workload in their first three years of teaching, again this was lower for fixed term (48%) and casual teachers (31%).

Strengthening TPAs alone will not improve the experiences of early career teachers. It is essential that all new educators have access to resourced support from their ITE institutions during pre-service practicums and to structured mentoring and induction programs, as well as reduced face to face teaching workloads in their first three years of teaching.

²³ National Initial Teacher Education Pipeline: Australian Teacher Workforce Data Report 1, retrieved from https://www.aitsl.edu.au/docs/default-source/atwd/reports/new-pipeline-report/2020_aitsl-atwd_pipeline-report.pdf p.13

Information request 5.2

Induction and mentoring programs

Would measures for improving early career teachers' access to induction and mentoring programs lend themselves to being a national policy initiative under the next intergovernmental agreement on schools?

There is a clear need for better professional experience (practicums) for student teachers and for better assessments of their readiness to teach, and to ensure they meet the Australian Professional Standards for Teachers. The AEU 2021 *State of our Schools* survey shows that new educators are not enthusiastic about how their ITE prepared them for teaching, and many did not receive assistance with the transition into teaching. On average they rate their ITE experience as 6 out of 10 and only one third intend to continue teaching in public schools until retirement. Very tellingly, only 5% of new educators said that they had received any follow up from their ITE institution at the start of their career.

Increased support for ITE students is sorely needed, and this must include ongoing observation of, interaction with, and advice from experienced teachers during practicums as well as a significant increase in support from ITE providers. There needs to be financial assistance for ITE students to undertake further or additional practicum during their studies, including support with living expenses and the maintenance of student lodgings.

Extended practicums must include an adequate level of in class supervision by a mentor. However, this must be done without creating additional workload burdens for teacher mentors. Current supervision payments which have been used to support teacher mentoring of ITE students have not kept pace with the cost of living and ITE providers often try to avoid making payments to teachers and/or schools.

Teachers build on their ITE by teaching, researching, self-reflection, working with colleagues, students, parents, community and through experience. Teachers must be given time within the school day to undertake these essential tasks to grow their own teaching and learning. This is especially true in the context of supervising ITE students on the professional experience/practicum components of their tertiary education.

At present, there is very rarely enough time for experienced teachers to effectively juggle the demands of their existing jobs whilst also providing mentorship and guidance to ITE students placed in a school setting. Often, payments from universities schools to provide supervision and mentorship to ITE students are delayed and the administrative requirements of supervising teachers from universities are extensive and often different between ITE institutions. All of this creates further obstacles to professional discussion and reflection, collaborative lesson planning, and provision of feedback.

Experienced teachers need to be provided with the capacity and workload relief required to mentor both student teachers during practicums and beginning teachers. Principals and school leaders need the resources to free up experienced teachers to do this. At a minimum, these should form part of the agreement between schools and universities to ensure that these resource needs are met – that universities provide prompt and full payment for the supervision of ITE students during practicums and that once graduates enter the teaching workforce, education departments provide sufficient resources to for mentoring.

There is a significant opportunity for this review to instigate a national program that provides adequate support for pre-service teachers to undertake extended practical experience in schools and provides the necessary resources to experienced teacher mentors and principals to allow them to engage effectively.

The next NSRA presents an opportunity, as part of a national teacher workforce strategy, to instigate an ambitious program that funds pre-service teachers to undertake additional extended practicums and provides schools with the resources to enable experienced teachers to mentor effectively.

The AEU recommends that the next NSRA mandates that all states and territories must ensure that early career teachers and their experienced mentors are funded to provide a specific number of hours of mentoring throughout the first three years of teaching.

Further, the AEU recommends that new educators are provided with workload relief in the form of additional non-teaching hours as a matter of course during their first three years of employment, and that experienced teachers are provided with appropriate workload relief to deliver mentorship.

Information request 5.3

The prevalence of teacher attrition

Are the drivers of attrition amenable to government policy? How could government policy address high teacher attrition?

As detailed in the AEU's original submission to this review, the national teacher shortage has been building for years, and AEU members experience the impact of it every day.

AITSL estimates that non-retirement attrition could be 14% over the next 10 years, and that current teacher supply "will not be sufficient to replace retirement loss over the next five to ten years". The AEU's *State of Our Schools* survey shows that almost half (47%) of 787 public school principals surveyed experienced teacher shortages in the last year, and this increases to more than half of principals in remote schools (54%) and three quarters in very remote schools (75%). There was also significant differentiation by the socio-economic status of the school student cohort, with 53% of principals at low SES schools reporting teacher shortages compared to 38% of principals at high SES schools.

To retain teachers it is necessary to invest in appropriate salary structures that reward teachers' experience and expertise and to provide teachers with the time and space to do their jobs. Numerous international studies from the 1970s to the current decade have consistently shown that higher teacher salaries relative to those of other comparable professionals increase the likelihood of highly performing secondary students becoming teachers, and reduce long term rates of attrition. Chevalier, Dolton & McIntosh (2006) found that the number of high quality secondary school graduates who enter teaching rises and falls in direct correlation with teachers' salaries.²⁴ As pointed out by Ingvarson et al. in their submission to the Teachers Education Ministerial Advisory Group (TEMAG) in 2014, there is also a clear correlation between a country's investment in teachers' salaries and the performance of its students in PISA tests. Furthermore, whilst early career teachers are remunerated at similar levels to those in other graduate positions, there is a noticeable lag in teachers' pay

²⁴Chevalier, A., Dolton, P. & McIntosh, S. (2007). Recruiting and retaining teachers in the UK. An analysis of graduate occupational choice from the 1960s to the 1990s. *Economica*, 74(293), pp. 71

progression over time which leads to shortages, attrition and difficulties in recruitment, particularly for teachers in Science, Technology, and Engineering and Mathematics (STEM) subjects.

Workload is a major issue for the teaching profession and a consistent barrier to retaining experienced teachers, and there is a huge body of evidence showing that unrelentingly high workloads are actually driving teachers away. As such, the AEU welcomes draft recommendation 5.2 that “reducing teacher workload should be a focus of the next agreement”.²⁵

Both the Victorian and the NSW Teachers Federation Branches of the AEU have conducted extensive studies of teachers’ workloads and average weekly working hours in recent years, and both have found that teachers are working substantially more hours than contracted at significantly higher levels than the OECD average, and are undertaking a very large amount of work at home and during holidays.

In NSW, a survey of over 18,000 teachers found that the average full time teacher is working 55 hours per week during term time, with over 43 hours per week at school on average and a further 11 hours per week at home.²⁶ In Victoria, a 2016 study of classroom teachers reported working an average of 53 hours per week, and leading teachers reported working an average of 55 hours per week. These results have since been validated by another 2021 survey of over 10,000 Teachers in Victoria which found that on average they work 53 hours per week.²⁷ As pointed out by McGrath-Champ et al, both the Victorian and NSW average teacher working hours are considerably higher than the OECD average, which measures teachers’ required hours overall at approximately 1,200 hours per year. McGrath-Champ, et al extrapolate teachers’ reported hours in NSW to approximately 1,720 hours per year, suggesting they are high on an international scale, and exceeding their contractual workloads by up to 43%.²⁸

In the 2021 Victorian workload survey, only 14% of teachers said that their workload is often or nearly always manageable, and only 15% felt that they often or nearly always had a good balance between home and work. 84% of teachers indicated that their workload at some stage has had a negative effect on their home life, and most alarmingly, 49% teachers in all schools indicated that their workload often or nearly always adversely affected their health.²⁹ In addition to excessive working hours, a large majority of teachers report significant workload intensification and sustainability concerns. The AEU’s national *2020 State of our Schools* survey found that of the 73% of experienced teachers who are considering leaving the profession prior to retirement, 88% said that workload would be the driving factor for their decision.

The consistency of these results across states and across teachers of all levels of experience in both primary and secondary schools, clearly indicates that work in schools simply is too great in volume

²⁵ Productivity Commission 2022, Review of the National School Reform Agreement, Interim Report Overview, Canberra, September, p 36

²⁶ McGrath-Champ, S., Wilson, R., Stacey, M. & Fitzgerald, S., (2018) *Understanding Teaching in Schools, the Foundation for Teaching and Learning: 2018 Report to the NSW Teachers Federation*, Sydney, p. 14

²⁷ *State of our School Survey Results: Survey of Victorian Public School Staff, conducted Feb-March 2021*, retrieved from <https://www.aeuvic.asn.au/sites/default/files/vgsa/210430%20State%20of%20our%20Schools-FINAL.pdf?t=1619736721>

²⁸ McGrath-Champ, et al. *Op cit.* p.28.

²⁹ Weldon, P. & Ingvarson, L. (2016), *School Staff Workload Survey: Final Report to the Australian Education Union Victorian Branch*, p.38

and intensity to be undertaken in the time available at school, and it is no surprise that less than one third of teachers say that they “have the time to do my job well.”³⁰

There are numerous policy levers that Commonwealth, State and Territory Governments have available to reduce the current unacceptably high levels of teachers being driven out of the workforce. Both levels of government have the opportunity in the next round of bilateral funding agreements to increase their recurrent funding to public schools to 100% of the SRS. This would immediately enable schools to hire many more thousands of additional teachers and to reduce class sizes and individual workloads. State and Territory Governments are able to improve teachers’ pay and career progression through their employment agreements.

The next NSRA could also reduce attrition by reducing the demands of compliance and administration work that is required of teachers. It could include commitments to decouple the NSRA measurement framework and performance indicators from NAPLAN and ensure that no new initiatives in relation to assessment, reporting, evaluation and accountability are imposed on teachers and principals without extensive prior consultation and negotiation with the teaching profession via its union, the AEU.

Information request 5.4

Teaching assistants and support staff

- 1. How are teaching assistants and support staff being deployed in schools and classrooms?**
- 2. What are the primary functions of teaching assistants and support staff in Australia?**
- 3. Could deployment and use of teaching assistants and support staff be improved to help reduce teacher workload? If so, should this be pursued through national collaboration?**

Support staff face the same immense pressures as teachers, and these have become particularly apparent over the past two years. In the AEU’s *State of Our Schools* survey more than a fifth (22%) said that they had not been well enough supported to undertake their role during the pandemic, 77% of support staff said that the pandemic had impacted on their home or family life over the last 18 months and 80% said that it impacted on their personal morale at work.

A third of support staff reported working additional hours during 2021. On average, those staff worked an additional 9 hours per week than they did previously, with 39% working between 10 and 19 additional hours per week and another 8% worked more than an additional 20 hours per week.

All states and territories have detailed classifications and standards frameworks for school support staff, who fulfil an incredibly wide range of duties in schools. The huge breadth of roles, skills and duties assigned to support staff is demonstrated by the more than twenty five separate support staff roles listed as found within the ACT Education Directorate.

Support staff are much more likely to be employed insecurely than teachers and in the *State of Our Schools* survey 55% of insecurely employed support staff said that their employment status made it likely that they would leave the education sector permanently before retirement. This is significant issue that could be addressed through the implementation of a more centralised of

³⁰ NSW People Matter Employee Survey 2020, retrieved from <https://www.psc.nsw.gov.au/reports-and-data/people-matter-employee-survey/pmes-2020>

recruitment and deployment of support staff, similar to teacher mobility systems at the state and territory level. A centralised recruitment process for teaching assistants and other support staff could be implemented as a National Policy Initiative as part of the next NSRA.

The AEU has significant concerns that entrenched under-resourcing of public schools means that support staff are often not supported sufficiently at work. Research conducted by the AEU ACT Branch found that 40% of Learning Support Assistants had been asked to teach classes with a relief teacher ‘sitting in for duty of care’, and 1 in 5 had been asked to teach a class alone (both of which are unlawful) due to teacher shortages.³¹ This shows that teacher shortages are pressuring schools and individual employees to feel that they must request unregistered people to teach.

It cannot be left to teaching assistants and other support staff to fill the gaps left by a shortage of qualified teachers. Governments must provide an allocation of additional teacher resource and/or education support staff hours to support students.

Information request 5.5

Streamlining pathways into teaching

- 1. How can pathways into teaching for mid-career entrants, especially those with skills in critical areas, be streamlined?**
- 2. What are the costs and benefits of re-introducing one year graduate diplomas?**
- 3. What employment-based pathways could be explored?**

Teaching, like other respected professions, must have a process for entry that includes rigorous preparation centred on academic study and professional experience, an in-depth test of subject and pedagogical knowledge, and a comprehensive teacher-readiness assessment. There must be no lowering of standards by reducing the duration of study or academic rigour required to gain teaching qualifications in Australia, regardless of prior experience. A suitable program of study and teacher professional experience (practicum experience) is a fundamental prerequisite for equipping future teachers with the knowledge, skills and attributes they will need to successfully teach in the increasingly complex 21st century school environments in which they will find themselves.

The AEU has always held the qualifications of teachers to high standards and is steadfast in its position that there must not be any weakening of either the content or entry requirements to ITE programs - as found by Darling-Hammond et.al “the greatest gains in student learning were attributable to...more experienced, better qualified teachers.”³² This is also supported by the OECD which raises concerns about the quality of teaching and learning in classes taught by teachers who are not fully qualified and found that “a higher concentration of lesser qualified or novice teachers in schools serving disadvantaged students can have a negative impact on student performance, further diminishing their chances of success.”³³ This finding serves as a clear warning on the potential impact the further expansion of alternative pathways such as Teach for Australia (TFA), which

³¹ Australian Education Union ACT Branch, *Under-staffed, under-resourced, under-appreciated:*

The teacher shortage and its impact on our schools: Findings from the AEU ACT Branch 2021 Educator Survey, 2021, retrieved from https://www.aeuact.org.au/application/files/4216/3003/1401/AEU_Report_FINAL_26AUG2021.pdf

³² Darling-Hammond, L., et.al, *Empowered Educators: How High-Performing Systems Shape Teaching Quality Around The World*, 2017, p.111

³³ Schleicher, A. (2012), Ed., *Preparing Teachers and Developing School Leaders for the 21st Century: Lessons from around the World*, OECD Publishing, p.58

deliberately and explicitly aims to place unqualified teachers into schools in disadvantaged communities.

The AEU is committed to a minimum five year full time equivalent qualification for teaching qualifications, as was agreed by all Commonwealth, state and territory education ministers in 2013, and will strongly and actively oppose any lowering of qualification benchmarks from ITE providers, governments or registration authorities.

The AEU supports the entry of mid and late career professionals into teaching but this must not be accompanied by any lowering of qualification standards that could undermine the pedagogical knowledge and skills base required to teach effectively. As stated by the Melbourne Graduate School of Education (MGSE) it is essential that graduate teachers display “achievement and persistence at tertiary studies and bring maturity and knowledge and skills that provide a solid platform from which to develop specific pedagogical understandings”.³⁴

Whilst entry to teaching at the mid or late career stage certainly does allow entrants to draw upon substantial knowledge and experience gained through extensive prior participation in the workforce, the science and pedagogy of teaching requires extended immersion and rigorous consideration of theories of learning and understandings of student complexity and their needs.

For this reason, the AEU strongly supports the current requirement for post graduate ITE courses to consist of a two year master’s degree and does not support the reintroduction of one year graduate diplomas.

Teach for Australia is illustrative of the detrimental impact of programs that promise streamlined fast track entry into the teaching profession. Evidence from the implementation of its predecessor Teach Next,³⁵ demonstrates that such ‘fast track’ programs are wasteful and inefficient and undermine both teaching quality and retention. Recruiting unqualified and inexperienced TFA associates to teach in the most disadvantaged communities is not just counterintuitive, it is damaging for all concerned; the model has not succeeded in its stated goals anywhere it has been implemented.

The Teach for Australia program is expensive and is not cost efficient. The Commonwealth has provided \$57 million for the program from 2008–09 to 2017–18, followed by additional funding of \$20.5 million to 2020–21³⁶ (an investment that has yielded a total of alumni of around 1000) and yet the program remains saddled with very high attrition rates. Furthermore, such attrition rates demonstrate that TFA Graduates are ill-prepared for the role and have a substantially higher drop-out rate from the profession than their fully qualified peers. The evaluation report commissioned by the Commonwealth Department for Education and Training from management consultancy firm Dandolo Partners, shows that within a year of completing their two year placement more than a third of TFA associates have already stopped teaching, and that after three years less than half of all TFA

³⁴ MGSE (2014). A response to the Teacher Education Ministerial Advisory Board’s Issues Paper on behalf of the Melbourne Graduate School of Education. Retrieved from <https://submissions.education.gov.au/Forms/TEMAG/layouts/SP.Submissions/ViewDoc.ashx?id=%7B0b89f457-18a0-48bd-832b-e837ad42cc1e%7D>, p.1

³⁵ Topsfield, J, *Gillard’s school plan costly failure*, The Sydney Morning Herald, 14/02/2013, retrieved from <https://www.smh.com.au/politics/federal/gillards-school-plan-a-costly-failure-20130213-2edbi.html>

³⁶ Answer to Question on Notice No. SQ17-000482, Additional Estimates 2016-2017, cited at <http://www.saveourschools.com.au/teachers/teach-for-australia-fails-in-its-mission>

associates are still employed as teachers.³⁷ The estimated cost of training each Teach for Australia alumnus who remains in the profession for at least three years is over \$100,000 dollars.³⁸

The dangers of Teach for Australia are increased by the fact that the program is explicitly aimed at attracting and supporting graduates to teach in schools in disadvantaged communities for two years, reducing teaching for those concerned to a short term philanthropic exercise rather than a long term professional commitment. The placement of TFA associates in such schools may further increase educational inequity, as evidence clearly demonstrates that the skills required to become an effective teacher cannot be acquired over such a short period of time. This short term placement of TFA associates, also runs against academic evidence which indicates that teaching quality improves with years of experience, and has the potential to contribute to the instability of staffing arrangements, further undermining the quality of education provided to students.

We note that the recent *Quality ITE Review* listed the move to a two year master's degree as a potential deterrent for mid-career professionals to become teachers and we are aware that the cost of the master's program and the cost of not working while undertaking the program have been touted as major disincentives. In order to ameliorate this the focus must be on ensuring that ITE students have access to adequate financial support during their studies to enable them to study for the required period of time, rather than on lowering standards to avoid the potential impact of time out of the workforce. These costs should be mitigated by making scholarships and/or bursaries available to mid-career professionals who wish to teach, rather than the counterproductive approach of fast tracking through TFA or other similar programs which result in underprepared fast tracked graduates in the classroom, which may increase the 'flow' of teachers into the profession but actually increases short and long term attrition and ultimately reduces the 'stock' of experienced teachers working in Australia's education systems.

Continued attempts to fast track mid-career professionals through ITE amount to an admission of policy failure and neglect by government – teacher shortages have been ignored for over a decade.

Australia needs a systemic approach to preparing teachers for a successful career in the classroom and a more rigorous threshold to ensure that every teacher entering the profession at any stage of their career is actually ready to teach. The top-performing countries in international assessments spend substantially more time and resources than Australia does to ensure that standards, programs and entry assessments are aligned and coherent. As found by the Teacher Education Ministerial Advisory Group (TEMAG), the Australian Professional Standards for Teachers (Professional Standards) and the Accreditation of Initial Teacher Education Programs in Australia: Standards and Procedures provide a strong foundation for improvement and the maintenance of quality in ITE. These standards must now be effectively applied and implementation timeframes improved to ensure that all those entering the teaching profession are properly prepared.

The AEU recommends that the next NSRA focus on encouraging mid-career professionals to enter teaching through the provision of financial support including bursaries and extended paid practicums, rather than further undermining ITE requirements through the extension of fast track or streamlined entry to teaching.

³⁷ Dandolo Partners (2017). *Teach for Australia Program Evaluation Report*. retrieved from https://docs.education.gov.au/system/files/doc/other/final_tfa_public_report.pdf, p.16

³⁸ Total Commonwealth funding provided to Teach for Australia (\$77.5 million) divided estimated maximum total alumni still working as teachers after three years (650)

Information request 5.6

Understanding what happens in the classroom

1. **What (if any) systems do jurisdictions already have in place to understand what is being taught in classrooms, and how it is being taught?**
2. **What are the options for obtaining more and better data on classroom practice in a way that minimises costs and administrative impost?**

Teachers must be granted the respect and trust of governments and permitted to exercise their professional autonomy whilst doing their jobs. “What happens in classrooms” is set out in the Australian Curriculum and teachers use their professional judgement to adapt the Curriculum to meet the changing needs of their students.

Table 1: Australian Professional Standards for Teachers

Domains of teaching	Standards
Professional Knowledge	1. Know students and how they learn 2. Know the content and how to teach it
Professional Practice	3. Plan for and implement effective teaching and learning 4. Create and maintain supportive and safe learning environments 5. Assess, provide feedback and report on student learning
Professional Engagement	6. Engage in professional learning 7. Engage professionally with colleagues, parents/carers and the community

Table 1 shows the seven professional standards for teachers in Australia. AITSL states that these standards exist to “contribute to the professionalisation of teaching and raise the status of the profession” by “providing a framework which makes clear the knowledge, practice and professional engagement required across teachers’ careers.”³⁹ It is clear from each of the seven standards and the four career stages (graduate, proficient, highly accomplished and lead teacher) that a significant level of professional autonomy over curriculum and practice is required to meet the standards and to progress through the career stages. However, we have recently seen a drive by federal, state and territory to increasingly restrict teacher’s autonomy over curriculum and assessment, and this is unfortunately reflected in the framing of information request 5.6.⁴⁰

A key finding of a study of the work composition of over 18,000 teachers in NSW found that “teachers require more professional respect, time and support for their teaching and the facilitation of student learning” and reported “an expansion of the range of duties performed, particularly in

³⁹ Australian Institute for Teaching and School Leadership (2011), *Australian Professional Standards for Teachers*, p.2

⁴⁰ NSW Teachers Federation Principals Conference (2013), *Research: Devolution in Education*, p. 32

relation to administrative tasks. Over 97% of teachers reported an increase in administrative requirements, while over 96% report an increase in the collection, analysis and reporting of data.”⁴¹

It is clear that the erosion of teachers’ professional autonomy through an increase in administrative workload and published standardised assessment impacts teacher’s sense of professionalism and stifles professional development and progress. The current prescriptive approach to curriculum and assessment, coupled with the increase in data collection and monitoring suggested by information request 5.6 can only serve to de-motivate and ultimately de-skill teachers, to stifle the morale of the workforce and degrade the status of the profession.

The AEU recommends that the next NRSA provides teachers a greater level of control over assessment and curriculum, and reverses the drive towards explicit instruction and undifferentiated national assessment. Support for professional autonomy in teaching, curriculum development and assessment and reporting must be increased and then maintained rather than undermined through increased monitoring and the increased collection of data.

Information request 6.1

Fostering school leaders

- 1. Do principals have the resources, support and professional development opportunities required for their demanding roles?**
- 2. Are policy efforts to identify and prepare potential leaders effective?**
- 3. Are there alternative sources of school leaders, including from outside the teaching profession?**
- 4. What are the relative merits of a nationally coordinated approach to supporting a pipeline of future school leaders?**

The 2021 *State of Our Schools* survey clearly demonstrates that principals are dealing with severe and ever increasing resource challenges:

- 61% of all public school principals report teacher shortages, a significant increase on the 47% reported in 2020 and with 2018, this is the equal highest figure ever recorded
- 48% of principals reported being under resourced, compared to 31% reported in 2020
- Only 11% of school principals say their school is well resourced
- 27% of principals say that the class sizes at the schools are too high, a substantial increase from the 18% that reported class sizes were too high in 2020
- 21% of principals said that they did not have adequate classrooms to meet student demand this year, and on average they required 3.5 additional classrooms to meet demand
- Over the next 3-5 years, 42% said that they would not have enough classroom capacity and would need an additional 4.7 class rooms on average.

These findings were reinforced by a 2021 survey by the AEU ACT Branch, which found that almost all principal respondents (94%) say that the ACT Education Directorate lacks the necessary resources to meet the demands of schools, and that almost three quarters of principals and deputy

⁴¹ McGrath- Champ, S., Wilson, R., Stacey, M. & Fitzgerald, S., (2018) *Understanding Teaching in Schools ,the Foundation for Teaching and Learning: 2018 Report to the NSW Teachers Federation*, Sydney, pp. 1-2

principals say that their school is not adequately funded to provide the relief staff required to cover teacher absences.⁴² The ACT survey also found that 70% of public school principals described their workload as difficult or extremely difficult and that more than one third of principals work between 10-15 hours over-time per working week and further third work more than 20 additional hours per week, not including weekend hours. A 2022 survey of principals using the SafeWork Australia endorsed People@Work survey tool for principals found that:

- Almost 60% of public school principals are experiencing either high or very high levels of psychological distress
- 37% reported being bullied in the last 6 months, primarily by parents and community members
- 69% reported experiencing work-related violence in the past 6 months, including being sexually assaulted, physically assaulted and intimidated

These striking and concerning results make it abundantly clear that the current funding and governance arrangements for public schools do not provide principals with the funding, infrastructure or professional development support they require.

In order to lead their schools, principals must have an intimate understanding of pedagogy and of the day to day work of teachers. Such an understanding can only be gained through lived experience. The increased finance and governance work expected from principals' limits their professional autonomy and has had severe consequences for the attractiveness of the principal role, with many state branches of the AEU reporting that the managerialisation of the principal role at the expense of a focus on educational leadership has resulted in increased difficulty in recruiting new principals.

Reducing the amount of devolved system management and administration work required of principals would mean providing more time to focus on educational leadership. This could be facilitated by the Commonwealth Department for Education and Training or state government departments taking back responsibility for some of those devolved tasks and removing or streamlining some compliance requirements.

There is room for school business managers to support principals and take on greater responsibilities as the managers of budgets and people in schools, so that principals can devote their time to educational leadership. However, deep experience as an educator is essential to the principal role and as such principals should not be recruited from outside the teaching profession.

The national teacher workforce shortage has direct consequences for the recruitment of principals and the AEU has received numerous examples of relatively inexperienced teachers in hard to staff regional and remote schools being promoted to principal out of necessity. It is essential that all governments work together to support and maintain a pipeline of appropriately experienced school leaders. Greater centralised systemic support and improved access to continuous professional development for school leaders and particularly new principals is crucial to build and maintain effective educational leadership and must be supported and resourced by education systems.

Options for doing this include the provision of incentives such as matched contributions to states and territories for induction, mentoring and continuing professional development of principals (separate

⁴² AEU ACT Branch, *Ibid*

and above agreed Commonwealth, State and Territory SRS amounts) or through a national programme administered by the Commonwealth Department of Education itself. This greater level of systemic support for mentoring support must include time-release and workload relief for participating experienced teachers and for existing principals.

Information request 7.1

Standalone reporting against the National School Reform Agreement

Would a standalone report on progress against the National School Reform Agreement outcomes and sub-outcomes (separate to the National Report on Schooling in Australia) improve the accountability of Governments to the community?

The AEU agrees with the Commission that:

Annual progress updates for the NPIs and bilateral agreements, one of the main accountability mechanisms in the NSRA, also appear lacking. Performance is self-assessed and updates provide scant information on how outputs are contributing to intended outcomes, leaving stakeholders with little sense of their overall impact or success⁴³.

The AEU is also very concerned about this narrow focus of current NSRA reporting. Prior to the signing of the current agreement there was a failure to consider whether the data that is being collected and reported on is actually the most useful for school staff and students. This is seen in the previous Government's failure to incorporate any aspect of the UNESCO Sustainable Development Goal 4 targets into the monitoring of the NSRA.

As a result, there is limited alignment between the NSRA and its key objectives, outcomes and targets and the communities that are directly impacted by them. The next iteration of Australia's NSRA reporting framework must involve significant consultation with teachers, who must be given the opportunity to engage in a genuine and beneficial way with any proposed objectives, targets and outcomes.

The current targets and benchmarks are significantly constrained by the failure of all Australian Governments to adequately consult with the teaching profession prior to setting the NSRA measurement framework and performance indicators in 2018. As such, the Measurement Framework for Schooling in Australia does not provide a complete picture of whether or not outcomes have been achieved. Each of the state and territory annual reports contain a long list of initiatives and activities undertaken, but there is next to no attempt in any of them to demonstrate how any of it benefits students.

The AEU asserts that a successful and useful assessment and reporting framework must:

- Support inclusive teaching and learning practices.
- Inform the teaching and learning cycle and to provide teachers, students and parents with information about the progress and achievements of students.

⁴³ Productivity Commission 2022, Review of the National School Reform Agreement, Interim Report, Canberra, September, p.22

- Form an integral component of the ongoing planning and modification of educational programs and practices and the targeting of specific resources.

Assessment should be authentic, closely aligned to curriculum and reporting and informed by classroom experience.

All assessment processes should be transparent in terms of their intent, the relationship to the curriculum, what is being assessed, how it is being assessed and the evidence used to make professional judgements.

Assessment must incorporate a range of professional practices including structured and impromptu observations; formal and informal discussions/interviews; collections of students' work; use of extended projects, performances, and exhibitions; tests and practical exams. The purposes of any assessment should be clear before it is implemented so that teachers, other educators, and students understand how it will inform teaching and learning and to ensure that the form of assessment chosen is fit-for-purpose and builds our students' capacity as learners.

Assessment must be teacher led and developed and must rely on and value informed teacher judgement, as this ensures the integration of a range of factors including knowledge of the student and performance in a variety of forms of learning and assessment. The same principles should apply to any model of student self-assessment.

To do this teachers require appropriate and ongoing professional development and adequate time to assess, evaluate, moderate and report on student learning.

An appropriate national assessment program should be able to balance and fulfil all of these needs by providing accurate and timely information based on the professional judgement of teachers, complimented by school based moderation processes, and testing a scientifically determined sample of students to determine program effectiveness and student academic achievement.

There are also issues between the Alice Springs (Mparntwe) Declaration and the NSRA Measurement Framework. There is poor alignment between education goals and system component parts. System accountability is an expectation, but the focus (and blame) when goals are not met falls disproportionately on schools and teachers.

What is most notable in the NSRA Measurement Framework and performance indicators is that there is no consideration of how the system is impacting on those who work and learn within it. The AEU proposes that there needs to be a national framework for states and territories to regularly and consistently report on the level and impact of ongoing teacher shortages, and that this should be a primary indicator within the next NSRA.

Other key measurements in the next NSRA Measurement Framework should include:

- The retention rate of teachers (with a particular focus on attrition and its drivers among early career teachers).
- The reasons for potential attrition among teachers considering leaving the profession.
- Teacher's views of the impact of current assessment protocols.
- The rate of secure employment for teachers (again, particularly for early career teachers).
- The experience of graduate teachers in their transition to the workforce.

- Consideration of teacher to student ratios, class sizes and adherence to industrial agreements in respect of class sizes.
- The ongoing personal and professional impact of high workloads and regular workload monitoring and its relationship to attrition.

These measures are necessary to begin to address the rapidly increasing national teacher shortage and ensuring that there is a qualified and effective teaching workforce in Australia. AITSL's ongoing Australian Teacher Workforce Data survey includes questions on employment security, working hours and workload composition, and the induction and employment status of graduate teachers but there is also a clear need for a much greater consideration of the impact on teacher and students of the initiatives driven by the NSRA within the measurement framework. Further, comprehensive workforce planning should be undertaken across the states and territories, to provide more focussed and better resourced delivery of ITE and maximise the retention of high-quality entrants and graduates in the teacher workforce.

Information request 7.2

Proposed sub-outcomes under the future agreement

Do the identified outcomes, and proposed additional and modified sub-outcomes, reflect the aspirations of all Australian students, including those from Aboriginal and Torres Strait Islander backgrounds, students with a disability, and students from other priority equity cohorts (including students from equity cohorts not explicitly identified in the current agreement, such as those in out-of-home care, or who speak English as an Additional Language or Dialect)?

The AEU agrees with the Commission that “wellbeing is largely missing from the objectives, outcomes and reform actions in the NSRA”⁴⁴ and the proposed modified sub-outcome on student wellbeing is a welcome recommendation. However, the AEU disagrees with the draft finding that “successful support of student wellbeing relies on teacher education and the culture of school leadership” and we suggest that the provision of resources to enable schools to support students is essential to improving student wellbeing. For this reason, the next NSRA should track the implementation of measures proposed by governments to achieve improved student wellbeing.

We agree with draft recommendation 3.1 that “bilateral agreements, developed in consultation with stakeholders, identify how jurisdictions will lift outcomes for students in each of the priority equity cohorts identified in the agreement, recognising their specific learning needs.”⁴⁵

For this reason, the AEU very strongly recommends that the NSRA measurement framework and performance indicators are decoupled from NAPLAN and that no new initiatives in relation to assessment, reporting, evaluation and accountability are imposed on teachers and principals without the extensive prior consultation and negotiation with the teaching profession and its union the AEU.

⁴⁴ Productivity Commission 2022, Review of the National School Reform Agreement, Interim Report Overview, Canberra, September, p.21.

⁴⁵ Productivity Commission 2022, Review of the National School Reform Agreement, Interim Report Overview, Canberra, September, p.32.

We suggest that the current sub-outcome to "increase the proportion of students attending school 90 per cent or more of the time" is supplemented by another sub-outcome focused on improving attendance for low attending students. For example "reduce the proportion of students with less than 50% attendance at school". Attendance based sub-outcomes should not, however, be linked to funding distribution.

The AEU Northern Territory Branch has provided evidence of the pernicious impact of attendance based outcome measures, particularly when they are directly linked to funding. The Effective Enrolment Program which distributes funds according to the attainment of enrolment benchmarks.

The recent systems analysis of the Effective Enrolment program in the Northern Territory found that it creates:

a system architecture that puts urban and remote schools in competition for a fixed pool of finite funding. This causes a 'success to the successful' phenomenon whereby a loss of resourcing in a school sets off a reinforcing feedback cycle leading to a subsequent reduction in its ability to engage students, and in turn further losses in resources. Since 2015 this downward spiralling feedback cycle has systematically and disproportionately impacted schools with high levels of low-SES students and First Nations students, especially in remote communities.⁴⁶

The AEU contends that per student recurrent funding should not be linked to attendance in this way that could impact students who have disengaged/ where attendance has fallen below a specific level and we concur with a key recommendation of the most recent report from the House of Representatives Standing Committee on Employment, Education and Training that:

As part of the new National School Reform Agreement, commencing in 2023, the Australian Government seek the agreement of the states and territories to ensure funding for schools is based on student enrolment rather than attendance.⁴⁷

⁴⁶ Yore, D. A Dynamic Systems Analysis of the Effective Enrolment Policy in Australia's Northern Territory, AEU Northern Territory Branch, 2022. P.1

⁴⁷ Standing Committee on Employment, Education, and Training, & Laming, A. (2022). *Don't take it as read: Inquiry into adult literacy and its importance*