

Australian Education Union

Submission

to the

Productivity Commission Review of the National School Reform Agreement

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Australian Education Union

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Introduction

The Australian Education Union (AEU) represents over 198,000 members employed in the public primary, secondary, early childhood and TAFE sectors throughout Australia. Public education is without a doubt the bedrock from which all Australians can secure a better future and the AEU strongly believes that this review should have within its remit the need for significant additional investment in public education. This submission will address the fundamental requirements for public education in Australia as well as providing answers to each of the four information requests made by the Productivity Commission.

A review of the National School Reform Agreement that does not consider funding is fundamentally flawed

The AEU notes that the National School Reform Agreement (NSRA) states that "the review will not include any assessment of compliance with section 22A of the Act". As the NRSA is inextricably tied to funding, as are the success or otherwise of the Reform Directions and National Policy Initiatives (NPIs), any review that is conducted without considering funding is fundamentally flawed. The exclusion of Section 22A from the review of the NSRA enables both Commonwealth and State/Territory governments to evade accountability on the impacts of legislation, the NSRA and bilateral funding agreements and thus, the direct impact of policy reform and tied funding decisions on schools, the education workforce and students.

For this reason, the AEU strongly believes that any consideration of the Reform Directions and NPIs within the NSRA requires a clear consideration of the funding shortfalls that currently situate public schools below 100% of the Schooling Resource Standard (SRS) and that are entrenched in the bi-lateral agreements associated with the NSRA for every state and territory.

¹ National Schools Reform Agreement, retrieved form https://www.dese.gov.au/quality-schools-package/resources/national-school-reform-agreement, p.6

Page 4 of the NSRA states:

"The Commonwealth provides funding to States and Territories to distribute to all eligible schools through the Act, based on the <u>Schooling Resource Standard (SRS)</u>. The SRS is made up of a base funding amount for every student plus six additional loadings that provide extra funding to meet the needs of all students."²

and page 11 of the NSRA states:

"The Act provides that schools currently below the consistent Commonwealth share will transition within six years to the final Commonwealth share, while those above will transition over ten years. Parties agree that States and Territories should consider a needs-based approach as the guiding principle for the allocation of any additional funds to schools and systems as a result of their bilateral agreement or requirements under the Act."

However, as funding is only "based on the SRS" in reality in no jurisdiction outside of the ACT will public schools be anywhere near the full SRS by the conclusion of the current NSRA and its associated bilateral agreements in 2023. Changes to Commonwealth funding arrangements contained in the *Australian Education Act* amended in 2017 dismantled the coordinated needs-based approach to schools funding initiated by the *Australian Education Act* 2013, and the bilateral agreements associated with the NSRA have only served to further dilute the original aims and focus of the 2013 Act.

The failure of the Commonwealth to honour the previous signed National Education Reform Agreements (NERA) with the states and territories resulted in public schools not receiving \$1.9 billion of funds that were expected under these agreements in 2018 and 2019. This was the first part of an estimated \$19 billion of funds previously promised to public schools over the decade from 2018 that now, under the NSRA and its associated bilateral agreements, has been denied to public schools from 2020 to 2023.

The changes to state and federal funding of schools resulting from the bi-lateral agreements and NSRA signed between State and Territory governments and the Commonwealth in 2018 and 2019 serve only to entrench funding inequality.

The SRS allocations set out in the bilateral agreements deepen the existing inequity between school systems to at least 2027 and entrench the gap in student learning outcomes in education. The AEU's position, supported by a large and credible body of national and international research, is that investment in equity in Australia's education system is vital to the nation's social cohesion, employment, continued economic growth and future commercial prospects.

² National Schools Reform Agreement, *Ibid*, p.4

³ National Schools Reform Agreement, *Ibid*, p.11

The Organisation for Economic Development's (OECD) *Education at a Glance 2020* accurately conveys this view when it says:

Giving everyone a fair chance to obtain a high-quality education is a fundamental part of the social contract. To improve social mobility and socio-economic outcomes, it is critically important to eliminate inequalities in educational opportunities.Higher levels of educational attainment are associated with several positive economic and social outcomes for individuals. Highly educated individuals are more socially engaged and have higher employment rates and higher relative earnings.⁴

In light of the proven positive correlation between equity in education and a broad range of social indicators, it is imperative that all governments ensure that public schools are guaranteed funding at a minimum of 100% of the SRS, and the AEU urges the Productivity Commission to consider and comment in this review on the failure of the bilateral agreements struck between the Commonwealth and State and Territory government to ensure that public schools are fairly and properly funded to a minimum of 100% of the SRS. It is important to recognise that the SRS was devised as the minimum funding amount required for schools to have 80% of students achieving at the national minimum standard, and that the full SRS is the bare minimum required, not an aspirational target.⁵

A recent report from education economist and former World Bank and Department of Foreign Affairs and Trade (DFAT) Advisor Adam Rorris uses the Department of Education, Skills and Employment's (DESE) own SRS and enrolment growth projections⁶ to quantify the impact that failing to meet this minimum standard has on schools and on individual students.

The DESE data in table 1 shows that for 2022 and 2023 the total underfunding of public schools will be \$9.2 billion dollars. This is the direct result of the 20% SRS cap on Commonwealth funding to public schools, in combination with state and territory funding arrangements. At the same time, private schools will receive government funding over and above 100% of the SRS totalling nearly \$1.4 billion dollars. From 2020 to 2023 the total recurrent funding shortfall for public schools will total \$19 billion. The projected shortfalls for just the remaining two years of the agreements are shown below.

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⁴ OECD (2020), *Education at a Glance 2020: OECD Indicators*, OECD Publishing, Paris. p. 38 5 Rorris, A., *The Schooling Resource Standard in Australia 2020-23: Impact on Public Schools*, 2020, p.1, retrieved from

http://www.aeufederal.org.au/application/files/5016/0393/4220/The Schooling Resource Standard in Australia.pdf

Commonwealth resourcing and SRS values – Senate Standing Committees on Education and Employment QUESTION ON NOTICE Additional Estimates 2019 – 2020 Outcome: Schools Department of Education, Skills and Employment Question. No. SQ20-000151. & Senate Standing Committees on Education and Employment, QUESTION ON NOTICE, Additional Estimates 2019 – 2020, Outcome: Schools, Department of Education, Skills and Employment. Question No. SQ20-000156, Projections for enrolments in schools.

⁷ Rorris, *Op. cit.*, p6

Table 1. Annual Public Funding for Schools – Above or Below School Resourcing Standard $(SRS)^8$

	2022	2023	Cumulative Total
Public	-\$4,714,517,971	-\$4,514,714,035	-\$9,229,232,006
NSW	-\$1,353,904,646	-\$1,275,297,677	-\$2,629,202,323
VIC	-\$1,332,984,043	-\$1,238,814,907	-\$2,571,798,950
QLD	-\$1,262,016,499	-\$1,264,523,232	-\$2,526,539,731
SA	-\$206,976,911	-\$188,790,247	-\$395,767,158
WA	-\$327,208,168	-\$288,544,182	-\$615,752,350
TAS	-\$71,955,975	-\$70,271,426	-\$142,227,401
ACT	\$25,435,688	\$ -	\$25,435,688
NT	-\$184,907,417	-\$188,472,363	-\$373,379,780
Private	\$602,479,656	\$791,573,805	\$1,394,053,461
NSW	\$300,768,987	\$366,880,256	\$667,649,243
VIC	\$53,868,192	\$118,362,025	\$172,230,217
QLD	\$161,675,842	\$180,181,271	\$341,857,113
SA	\$13,322,822	\$31,483,097	\$44,805,919
WA	\$58,681,535	\$75,726,901	\$134,408,436
TAS	\$2,795,207	\$7,081,927	\$9,877,134
ACT	\$21,350,778	\$17,715,928	\$39,066,706
NT	-\$9,983,707	-\$5,857,601	-\$15,841,308

Note: Red numbers indicate where combined public funding is below SRS minimum funding level. Black numbers indicate where combined public funding is above SRS minimum funding level.

As shown in Table 2, below, private schools in all states and the ACT will be funded above 100% of the SRS on a per student basis by 2022. This is in stark contrast with table 3, also below, which shows that in all jurisdictions (except for the ACT) public school systems will be underfunded by at least \$965 per student by 2022 and 2023. The greatest under-funding per student occurs in the Northern Territory (more than \$6,000) and in QLD (more than \$2,000 per student).

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⁸ Rorris, *Ibid.*, p6

Table 2. SRS Funding for Private Schools is above SRS levels by 2022, Per Student⁹

		2018	2019	2020	2021	2022	2023
NSW	\$	278	\$ 290	\$ 76	\$ 243	\$ 678	\$ 816
VIC	-\$	353	-\$ 292	-\$ 493	-\$ 283	\$ 145	\$ 315
QLD	\$	9	\$ 36	-\$ 110	\$ 32	\$ 552	\$ 606
SA	-\$	587	-\$ 496	-\$ 593	-\$ 371	\$ 136	\$ 318
WA	\$	123	\$ 167	-\$ 580	-\$ 338	\$ 415	\$ 532
TAS	-\$	552	-\$ 466	-\$ 616	-\$ 402	\$ 108	\$ 270
ACT	\$	3,258	\$ 2,911	\$ 862	\$ 762	\$ 720	\$ 587
NT	-\$	3,399	-\$3,023	-\$2,727	-\$2,216	-\$969	-\$575

Note: Red numbers indicate where combined public funding is below SRS minimum funding level. Black numbers indicate where combined public funding is above SRS minimum funding level

Table 3. Underfunding of Public Schools - Per Student Spending Below the Minimum School Resourcing Standard $^{I\theta}$

	2018	2019	2020	2021	2022	2023
NSW	-\$ 1,885	-\$ 1,873	-\$ 1,815	-\$ 1,737	-\$ 1,633	-\$ 1,525
VIC	-\$ 2,400	-\$ 2,372	-\$ 2,285	-\$ 2,162	-\$ 1,991	-\$ 1,819
QLD	-\$ 2,127	-\$ 2,141	-\$ 2,152	-\$ 2,164	-\$ 2,155	-\$ 2,147
SA	-\$ 1,443	-\$ 1,384	-\$ 1,303	-\$ 1,209	-\$ 1,147	-\$ 1,040
WA	-\$ 44	-\$ 533	-\$ 922	-\$ 1,167	-\$ 1,102	-\$ 965
TAS	-\$ 1,373	-\$ 1,367	-\$ 1,335	-\$ 1,313	-\$ 1,268	-\$ 1,241
ACT	\$ 1,256	\$ 1,108	\$ 930	\$ 752	\$ 544	\$ -
NT	-\$ 5,788	-\$ 5,932	-\$ 5,973	-\$ 5,972	-\$ 6,125	-\$ 6,264

Note: Red cells indicate where combined public funding is below SRS minimum funding level. White cells where combined public funding is above SRS minimum funding level.

¹⁰ Rorris, *Ibid.* p.7

⁹ Rorris, *Ibid.*, p.6

In addition to not reaching the basic minimum full SRS, the five-year bilateral agreements include provision for states and territories except the ACT to include "additional expenditure items" such as building depreciation and transport costs within their SRS calculations for public schools only. These items have never previously been included in SRS calculations and are not included in national SRS calculations. This narrows the gap between actual spending and the SRS goals by a further four percentage points and thus further reduces the actual effective SRS contribution made by each state or territory. It also undermines the entire concept of the SRS as a benchmark for equitable funding in schools and amounts to a separate capital depreciation tax levied only on public schools. As Rorris notes:

The effect of the 'capital depreciation charge' is to apply a segregated rort against public schools. It harms public schools primarily in that it allows state/territory governments to effectively reduce their cash allocations for public schools, by inserting into their 'contributions' towards the SRS the entirely notional figure for capital depreciation. This is an accrual-based allocation that does not touch the side of any real classroom or school. It is in effect a capital depreciation tax.

The injustice of the 'capital depreciation tax' is magnified because it is only and arbitrarily applied to public schools. No such 'capital depreciation tax' is applied to the private sector. Nor are the private schools apportioned (based on their enrolment size) a share of the public costs associated with authorities responsible for education standards and curriculum. 11

To the conclusion of the bi-lateral agreements in 2023, what Rorris describes as the "segregated rort" of the "additional expenditure" clause will deprive public school students of an additional \$7.9 billion in recurrent funding – this means that every public-school student will be deprived of a minimum of \$760 a year on average by 2023.

Table 3 Capital Depreciation Allowance – amount of funds deprived per public school student¹²

	2018	2019	2020	2021	2022	2023
NSW	\$ 663	\$ 690	\$ 715	\$ 737	\$ 759	\$ 784
VIC	\$ 640	\$ 669	\$ 693	\$ 714	\$ 736	\$ 760
QLD	\$ 673	\$ 700	\$ 727	\$ 750	\$ 774	\$ 800
SA	\$ 687	\$ 719	\$ 745	\$ 768	\$ 805	\$ 832
WA	\$ 653	\$ 679	\$ 704	\$ 725	\$ 747	\$ 772
TAS	\$ 707	\$ 735	\$ 762	\$ 786	\$ 811	\$ 839
ACT	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
NT	\$ 1,087	\$ 1,135	\$ 1,177	\$ 1,213	\$ 1,250	\$ 1,292

¹¹ Rorris, *Ibid.*, p.8

¹² Rorris, *Ibid.*, p.9

The total underfunding from the Commonwealth 20% SRS cap, the bilateral agreements and the additional expenditure clause is \$6.7 billion every year until the conclusion of the agreements in 2023.¹³

This 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. 14

The AEU believes the proper funding of public education through a needs-based, sector-blind model that incorporates full funding of the SRS is essential for fairness and equality of opportunity in education. As such, it should be seen by governments as a sensible and responsible investment rather than viewed in a reductionist way as a cost that must be contained, or one that can be bargained away through the inclusion of depreciation, transport costs and the costs of regulatory bodies in funding meant for the classroom.

The AEU strongly urges the Productivity Commission to consider the impact of this recurrent funding shortfall on the ability of 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.

Whilst the NSRA highlights that "constitutional responsibility for school education lies with States and Territories" in practicality public school funding has long been a shared responsibility between the State and Territories and the Commonwealth. Since the NSRA and bilateral agreements were first signed in late 2018 and early 2019 the AEU has strongly and consistently made the case that properly funding and resourcing public education is essential to ensuring fairness, equity, opportunity in this country, and that the achievement of these aims is a shared responsibility of both Commonwealth and State/Territory governments.

It is difficult to examine educational equity without also examining how resources are distributed between schools and systems with varying levels of need and varying capacities to effectively address their needs. This is precisely the failure of the Turnbull Government's decision to limit the Commonwealth's share of funding to public schools to an arbitrary proportion of costs based on school sectors. As noted by Dr Ken Boston (AO) in a speech early in 2017:

...the view that government schools are a state matter, and that fee-paying, government-funded non-government schools are a Commonwealth matter, is outrageous: the Commonwealth of Australia has a role in relation to the education of all young people in Australia, and every state minister for education has responsibilities for the education of all young people in the state, regardless of the schooling sector they attend¹⁶.

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¹³ Rorris, Ibid., p.9

¹⁴ Rorris, *Ibid.*, p.9

¹⁵ National Schools Reform Agreement, *Op. cit,* p.3

¹⁶ Boston, K.(2017). 'Vision or hallucination? Some reflections on the Gonski Review', Address to the TJ Ryan Foundation Brisbane, 14 February 2017. Retrieved from http://apo.org.au/system/files/73736/apo-nid73736-29261.pdf

In the same speech, Dr Boston also articulated the relationship between resources and outcomes, particularly for disadvantaged students. In doing so he also outlined some of the interventions required to the best outcomes for those students including,

...smaller class sizes, specialist personnel to deliver the appropriate tiered interventions, speech therapists, counsellors, school/family liaison officers including interpreters, and a range of other support. And that support requires money. You cannot deliver education as a genuine public good, without strategically differentiated public funding directed at areas of need. That's what Gonski sought to achieve.¹⁷

All governments must meet their obligations and responsibilities to ensure that our public education systems are properly resourced and that requires the Commonwealth to engage with the State and Territory governments to lift their respective funding contributions to achieve 100% of the SRS for all public schools.

Public school students in Australia have now waited more than a decade for the fulfilment of Gonski's promise of the minimum required needs based funding. The AEU strongly urges the Productivity Commission to consider the impact that the combined \$6.7 billion annual shortfall in funding to public schools on their ability to meet the reform requirements of the NSRA, and to recommend that all governments and school systems live up to original commitments under the 2013 Education Act and:

- Remove the arbitrarily imposed Commonwealth contribution cap of 20% of the SRS.
- Require States and Territories to fund their full contribution of SRS.
- Remove the 4% "additional allowance" from the 2023 NSRA and bilateral agreements.

Further, we recommend that the next NSRA explicitly establishes a timeline for the achievement of the full SRS for public schools and that any future review of the NSRA should explicitly reference progress towards fair and proper funding for public schools within its terms of reference.

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¹⁷ Boston, K.(2017). 'Vision or hallucination? Some reflections on the Gonski Review', Address to the TJ Ryan Foundation Brisbane, 14 February 2017. Retrieved from http://apo.org.au/system/files/73736/apo-nid73736-29261.pdf

Information Request 1: *Drivers of student outcomes*

- a. What does the evidence suggest are the key drivers of student outcomes across the three key NSRA domains academic achievement, engagement, and skill acquisition?
- b. Are there barriers that disproportionately impact outcomes for specific cohorts of students?
- c. Which of these drivers or barriers can governments change or influence?
- d. Have these drivers changed over the past decade or over the life of the NSRA? e. Looking forward, are there changes in the external environment or policy context that will affect these drivers?

Equity is the key driver of successful student outcomes, and Australia's lack of educational equity is the primary barrier

Inequity in schools is a symptom of inequity in society and students' first educational experience is often where the impact of disadvantage first becomes apparent. There is a wealth of evidence showing that disadvantage and compound disadvantages are a key driver of inequities in educational outcomes. Whilst educational equity is of primary importance for the NSRA, it is imperative that governments recognise that their role must also be to address inequity within society through public health and early learning before students reach the school classroom, rather than monitoring, measuring and seeking to address the impacts of disadvantage only once a child's educational engagement has begun.

Page 4 of the NRSA states that:

The wellbeing of all students is fundamental to successful education outcomes. Parties recognise the critical importance of supporting and facilitating the achievement of priority equity cohorts, including Aboriginal and Torres Strait Islander students, students living in regional, rural and remote locations, students with a disability and students from educationally disadvantaged backgrounds. ¹⁸

Greater and sustained investment is needed to assist schools to bridge the huge equity and achievement gaps between students from households of high and low educational advantage. The most recent PISA results demonstrate the growing gap between students from socioeconomically advantaged and disadvantaged households. The 2018 PISA results for Australia reveal that students from low socio-economic status (SES) households are highly segregated from their more advantaged peers and up to three years behind them across all domains:

• Australia's isolation index score of 0.20 for students from disadvantaged backgrounds is higher than the OECD average of 0.17 and higher than 51 of the 78 countries and economies included in PISA. This means that these students are more concentrated in schools with other students from disadvantaged backgrounds in Australia than in most countries in the OECD.

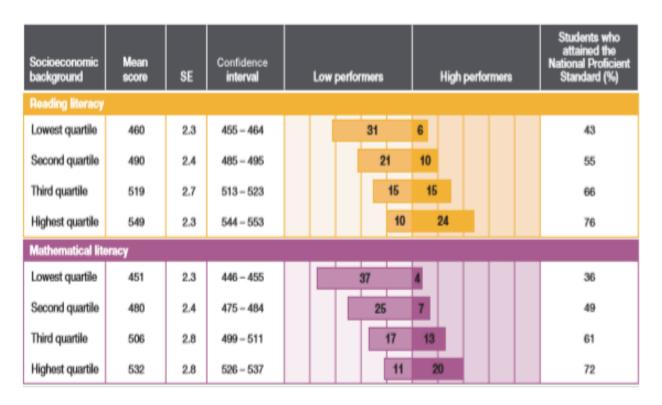
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¹⁸ National Schools Reform Agreement, *Op. cit,* p.4

- Across all domains students from high SES backgrounds performed better than those from low SES backgrounds.
- The proportion of students performing highly increased and the proportion of students performing lowly decreased with each increase in SES quartile.
- In science, the variance between average scores of highest and lowest SES quartiles was 82 points, with 30 points equivalent to one year of schooling, so the difference is approximately two and three-quarters years of schooling.
- In reading, the variance between average scores of highest and lowest SES quartiles was 89 points, with 30 points equivalent to one year of schooling, so the difference is three years of schooling.
- In maths, the variance between average scores of highest and lowest SES quartiles was 81 points, with 30 points equivalent to one year of schooling, so the difference is two and two-thirds years of schooling.¹⁹

As table 4 shows, 31% of low SES students are classed as "low performers" in reading, 37% in maths, whilst only 6% of low SES students are "high performers" in reading, and only 4% in maths.

Table 4 Australian PISA results 2018 by socioeconomic background²⁰



The 2019 Trends in International Maths and Science Study (TIMSS) results present an identical picture of the progress of Australia's students being held back by socio-economic

¹⁹ Thompson, S, De Bortoli L, Underwood C & Schmid, M. *PISA 2018, PISA in Brief: Student Performance*, Australian Council for Educational Research, 2019, p.18

²⁰ Thompson, S, De Bortoli L, Underwood C & Schmid, M. *PISA 2018, PISA in Brief: Student Performance*, Australian Council for Educational Research, 2019, p.18

inequity. In terms of international benchmarking, between 68% and 78% of Australian students achieved the TIMSS Intermediate international benchmark—the nationally agreed proficient standard—compared to more than 90% of students in the highest achieving country, Singapore.²¹

PISA 2018 reported slight increases in mean scores across the entire student cohort, however these were mainly due to an increase in the proportion of high performing students rather than the results of improvement across the board. There has been no improvement in the proportion of low performing students since 2015. TIMSS shows that the gaps between high and low performing students have widened, and students of low socio-economic status, Aboriginal and Torres Strait Islanders students and students in remote schools are significantly overrepresented among students with low achievement and those who do not meet proficiency benchmarks, demonstrating the continued social stratification of school education in Australia. Dr Sue Thompson, Deputy CEO of ACER, commenting on the TIMSS 2019 report, noted that:

However, as always, we need to note that these results are not uniform, and that there is still a solid tail of underachievement that needs to be addressed. Acknowledging that the primary underlying factor behind poor achievement is socioeconomic background, and finding ways of redressing the imbalance in opportunities and resources available to these students, will help lift achievement for all Australian students. ²²

Public education is a public good and the availability of a comprehensive education available to all benefits the whole of society. Public education provides lifelong benefits through improved health, wellbeing and employment options, improves society by increasing equity and social cohesion and provides a myriad of economic benefits in terms increased productivity and economic activity.

The Alice Springs (Mparntwe) Declaration states "Education has the power to transform lives. It supports young people to realise their potential by providing skills they need to participate in the economy and in society and contributing to every aspect of their wellbeing" and that "education plays a vital role in promoting the intellectual, physical, social, emotional, moral, spiritual and aesthetic development and wellbeing of young Australians, and in ensuring the nation's ongoing economic prosperity and social cohesion." ²³

In order to fulfil this fundamental purpose and to nurture students to develop these skills it is absolutely necessary that public schools have adequate resources to hire and retain teachers and education support personnel in the profession and to maintain comprehensive and specialist learning programs to enable all students to reach their full potential.

²¹ Thomson, S., Wernert, N., Rodrigues, S., & O'Grady, E. (2020). *TIMSS 2019 Australia. Volume I: Student performance*. Australian Council for Educational Research. p.xvi

²² ACER, Press release, 8/12/2020, retrieved from https://www.acer.org/au/discover/article/australia-lifts-its-performance-on-global-mathematics-and-science-test

https://docs.education.gov.au/documents/alice-springs-mparntwe-education-declaration

We must move beyond platitudes to Close the Gap

Equity is the primary and most potent driver of improved student outcomes, and the current inequities that exist in our education system for Aboriginal and Torres Strait Islander students are a significant and entrenched barrier to improving outcomes. The Prime Minister's 2020 Closing the Gap Report to parliament shows that over the past thirteen years there have only been marginal improvements to education and health outcomes for Aboriginal and Torres Strait Islander people.²⁴

Australian Bureau of Statistics (ABS) data shows that 81% of students living in remote or very remote areas attend government schools²⁵, and data from the Australian Curriculum, Assessment and Reporting Authority (ACARA) shows that 84% of Aboriginal and Torres Strait Islander students attend government schools, compared to 65% of non-indigenous students.²⁶

In the AEU's Submission to the House of Representatives Standing Committee on Indigenous Affairs 2015 Inquiry into Educational Opportunities for Aboriginal and Torres Strait Islander Students, the AEU asserted:

Meeting the needs of Indigenous communities in education is resource-intensive and cannot be achieved in a political environment where actions by Federal, State and Territory Governments undermine and diminish their responsibility for the provision of long-term sustainable public services. Equity for disadvantaged students cannot be achieved unless a high priority is given to addressing the achievement gaps which confront Aboriginal and Torres Strait Islander children.²⁷

That submission outlined a range of initiatives and programs that have demonstrated positive results for Aboriginal and Torres Strait Islander students that that could and should be revived under the next iteration of the NSRA. For example, Northern Territory schools funded under the National Partnership Agreement on Low SES School Communities saw funded primary schools make greater literacy and numeracy gains than unfunded schools. The 2015 submission also contains accounts of schools which have successfully invested extra funding gained under the previous National Education Reform Agreements (NERA) arrangements to make tangible improvements to outcomes for Aboriginal and Torres Strait Islander students. ²⁹

Geographic location and socioeconomic stratification are also important factors when considering the Commonwealth Government's obligations to appropriately resource schools that educate Aboriginal and Torres Strait Islander students. The Closing the Gap Report shows that school attendance rates for Indigenous students have not improved over the past five years. Attendance rates for Aboriginal and Torres Strait Islander students remain lower

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²⁴ https://ctgreport.niaa.gov.au/

²⁵ Numbers and proportions of students in ABS remoteness categories by school sector, 2016 Source: Australian Bureau of Statistics 2017

²⁶ ACARA data portal, retrieved from https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia-data-portal/student-numbers

²⁷ Australian Education Union (2015), Submission to the House of Representatives Standing Committee on Indigenous Affairs Inquiry into Educational Opportunities for Aboriginal and Torres Strait Islander Students, 2015, pp.4–5.

²⁸ *Ibid*, p.10

²⁹ *Ibid*, p.11

than for non-Indigenous students (around 82% compared to 92% in 2019, and that the gap in attendance is carried through and widens through the schools pathway from 9 percentage points in primary school to 17 percentage points by Year $10.^{30}$ There remains an acute difference in educational outcomes between Aboriginal and Torres Strait Islander and non-Aboriginal and Torres Strait Islander students. Whilst there has been some improvement in literacy and numeracy outcomes, the target to halve the gap in reading and numeracy for students in years 3, 5, 7 & 9 have not been met.³¹

Resources are a crucial component of closing the gap in educational outcomes for Aboriginal and Torres Strait Islander students, particularly in regional, rural and remote communities.

As noted by Riddle and Fogarty:

"Closing the gap in education is intrinsically linked to multiple aspects of socioeconomic disadvantage, including access to quality health, employment, incarceration rates and housing. These combine to form the social determinants of educational success." ³²

It is evident that the changes made to state and territory Schooling Resource Standard (SRS) contributions and the imposition of the 20% Commonwealth Government contribution cap found in the NSRAs will make it more difficult to capitalise on gains that have been made since the introduction of the Closing the Gap framework in 2008. This is particularly the case in the Northern Territory, which despite having the highest levels of student disadvantage in the country, has the lowest level of base SRS funding of any jurisdiction through to 2023. The combined Territory and Commonwealth contributions to public schools, where 44% of students are Aboriginal and Torres Strait Islander³³, will peak at 79.0% of SRS in 2023.

At the school level, the significant over representation of Aboriginal and Torres Strait Islander students among those who do not meet proficiency benchmarks demonstrates the continued social stratification of school education in Australia, and senior secondary completion rates suggest that for many Aboriginal and Torres Strait Islander students, school is not a culturally safe place.

Cultural intelligence and the promotion of cultural safety require constant learning. The AEU believes that in order to improve achievement outcomes for Aboriginal and Torres Strait Islander students pedagogical processes to support the development of cultural competence of Australia's teacher workforce are essential to facilitating cultural safety for Aboriginal and Torres Strait Islander students. These processes should be supported by the Reform Directions of the NSRA.

The 5th National Aboriginal and Torres Strait Islander Education Conference (NATSIEC) in 2018 made numerous recommendations that are very relevant to this review and which the AEU recommends are a focus of future NPIs of the next NSRA, including:

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³⁰ https://ctgreport.niaa.gov.au/sites/default/files/pdf/closing-the-gap-report-2020.pdf p36

³¹ https://ctgreport.niaa.gov.au/sites/default/files/pdf/closing-the-gap-report-2020.pdf p46

³² Stewart Riddle and Bill Fogarty (2015). 'Closing the Gap in education report card: needs improvement', The Conversation, retrieved from https://theconversation.com/closing-the-gap-in-education-report-card-needs-improvement-37455

³³ Northern Territory Department of Education (2018) Annual Report, Northern Territory Government, pp. 72

- The establishment of a community-led independent Aboriginal and Torres Strait Islander Education Institute to identify and promote evidence and best practice, monitor integrity and effectiveness of Indigenous education policy and practice. In particular, Indigenous youth are afforded a significant voice in education policy and delivery that impacts on the lives of young people.
- 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 recommitment of the Australian Education Council, education jurisdictions and institutions to a more equitable ratio of Indigenous workforce to the Aboriginal and Torres Strait Islander students they support, as agreed by all Australian Education Ministers in 2015.
- That jurisdictions ensure quality teaching and compliance with the mandatory elements of Aboriginal and Torres Strait Islander Histories and Cultures in the Australian Curriculum. Teacher ignorance or anxiety should not relegate learning about First Nation cultures to the margins of school curriculum or higher education studies.
- That the Indigenous Advancement Strategy Children and Schooling program is reinstated to the Australian Government education portfolio to ensure improved integration with education sector policy, delivery and accountability.
- That significantly increased levels of funding transparency, links to evidence, and accountability of Indigenous education expenditure, complementary and discrete to mainstream funding are made available.

The gaps in outcomes between Aboriginal and Torres Strait Islander people and non-Aboriginal and Torres Strait Islander people are primarily driven by the gaps in systems. Unstable, under-funded and/or poorly targeted education funding models result in lack of stability in the system as a whole and impact on the roll out of policies, programs and accountability frameworks, which in turn impact on student access and outcomes.

It is crucial to the wellbeing of all communities, particularly for Aboriginal and Torres Strait Islander communities, that the public education system in all states and territories provides access to quality, culturally appropriate education and strives for equitable outcomes for all students.³⁴

The stop gap solution so often deployed by governments of funding the private school sector to educate Aboriginals and Torres Strait Islander students in boarding schools in lieu of proving a local public secondary school must cease. The 2022-23 federal budget saw another \$17.3 million allocated to the private boarding school sector to target Aboriginal and Torres Strait Islander students.³⁵

This policy does not reflect the wishes of Aboriginal and Torres Strait Islander parents living in remote communities. It is not 'school choice' when there is no local public school to choose.

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³⁴ Johnson, P, *Educational Provision for Remote Indigenous Communities*, Cokehill Consulting, 2016, p.38.

³⁵ Australian Government, Department of Education, Skills and Employment *Portfolio Budget Statement 2022-* 23, p.18

The next NSRA must urgently address the lack of secondary school provision for Aboriginal and Torres Strait Islander students in remote communities. Further, the next NSRA must include a comprehensive Aboriginal and Torres Strait Islander teaching workforce strategy that builds on the outcomes of the highly effective and successful but discontinued More Aboriginal and Torres Strait Islander Teachers Initiative (MATSITI).

Fundamental to Aboriginal and Torres Strait Islander peoples' participation in the delivery of education is an open, honest and explicit partnership with schools, communities and government. Culturally appropriate two-way communication with the community to assess the diverse needs and expectations of each Aboriginal and Torres Strait Islander community is essential. Aboriginal and Torres Strait Islander people, like all members of Australian society, have the fundamental right to be involved in all areas of decision-making that impact their lives and the lives of their children and the next NSRA should reflect this accordingly.

Students with disability must have appropriate and fully funded resources to meet their needs

A well-resourced public education system that values diversity, understands social and cognitive development, engages all learners through inclusive processes and is responsive to fundamental human needs, has the potential to develop highly literate, numerate, actively engaged, resilient and connected members of the wider community.

Resourcing for students with disability is by its very nature intensive. This resourcing must continue to ensure adherence to philosophies of equity, social justice and inclusivity. Despite numerous official reports and State and Commonwealth government reviews over the past two decades identifying serious deficiencies in the resourcing of the education of young Australians with disability, and recent changes to funding and loading arrangements, there has been little progress in this regard. While governments have talked about the problem many thousands of children with disability have started and finished primary school without seeing any improvement in the resources provided by governments to them.

The original 2011 *Review of Funding for Schooling* identified disability as one of the key factors of disadvantage affecting school attainment and achievement, and made a key recommendation that resourcing for students with disability be "set according to the level of reasonable educational adjustment required to allow the student to participate in schooling on the same basis as students without disability." Additional targeted resources were viewed by the review panel as being a basic matter of equity that will keep more students in schools longer and raise skill levels and ultimately lift workforce participation of persons with disability.

However, changes to disability loading categories in recent years have left many students without any support, or with inadequate support. In 2018, over half of all children with disability who attended school accessed support or a special arrangement (58.6% or 167,400). Around one third accessed special tuition (36.8% or 105,200) while around one quarter accessed a counsellor or special support person (23.2% or 66,100). Of those children aged 5-

³⁶ Gonski et al, *Ibid.* p. 185

14 years who received support or special arrangements, over one third (36.1% or 60,500) reported that they needed more support than they received.³⁷

The Nationally Consistent Collection of Data (NCCD) dataset as reported by the Australian Curriculum and Assessment Authority (ACARA) has consistently reported a much higher prevalence of disability among school students than the ABS, and the most recent data in the 2021 collection shows that 21.8% of all students, and 22.6% of public school students had a disability, as defined by the Disability Discrimination Act.

According to ACARA there were approximately 592,000 students with disability in public schools in Australia in 2021, but at least 186,000 of these students were not in receipt of any loading.³⁸

With nearly 70% of students with disability enrolled in public schools and 86% of all students with disability being educated in mainstream schools³⁹ there is an extraordinary contribution made by the teaching profession and education support staff in the education of students with disability, in an under resourced system where workload pressures are immense.

In order to provide students with disability with the best possible opportunity to achieve, engage and acquire skills, the following steps must be taken in into account in the next NSRA:

- 1. Governments must ensure that students with disability have access to a broad range of education settings to meet the educational, social, emotional and physical needs of all students.
- 2. Governments must undertake a review of loading mechanisms for students with disability to determine the real costs of ensuring that all students with disability can access a high-quality education regardless of learning environment so that such loadings are set according to the level of reasonable educational adjustment required to allow the student to participate in schooling on the same basis as students without disability."⁴⁰
- 3. Governments must ensure that all education sectors have funding certainty so that they can plan effectively and are not limited in the support they can provide to students with disability in terms of in-class education support personnel, personalised lesson plans, or vital equipment.
- 4. Governments must ensure that staffing allocations genuinely reflect the appropriate staff/student ratios and provide the funding needed for the development of individual learning plans. This includes the provision of teacher relief to cover classes while teachers develop, implement, monitor and review individual learning plans.

³⁷ Australian Bureau of Statistics, *Schools dataset*, 2018

³⁸ ACARA, *National report on Schooling Data Portal*, 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#SWD

³⁹ Education Council, *2016 Emergent data on students in Australian Schools receiving adjustments for disability,* retrieved from: https://www.education.vic.gov.au/Documents/school/principals/health/ED17-0046%20SCH%20NCCD%20Report%202017 ACC%20%281%29.pdf

⁴⁰ Gonski et al, Op. cit p. 185

5. Governments must provide an adequate allocation of additional teacher resource and/or education support staff hours to support students with disability.

Additionally, and importantly, much greater attention needs to be paid to the impact from the NSRA and its bi-lateral agreements in not meeting the full SRS on all equity measures. 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 NSRA and 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 resource 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 DESE 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 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.⁴¹

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

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

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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%. 42 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 with disability have access to the support that they need to participate in education on the same basis as students without disability, but it is the responsibility of governments who administer and fund these systems to ensure that schools have the resources necessary to support students with disability. 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 next NSRA must as a priority ensure that all schools systems have the resource and staff capacity required to assess students with disability and attention must be paid to ensuring that all students are able to access the level of support appropriate to their needs.

Equity measures in the NSRA must directly address the holistic needs of students with disability who are more likely to be subject to compound disadvantage.

For example, census data shows that Aboriginal and Torres Strait Islander people have higher rates of disability than non-Indigenous people across all age groups. Aboriginal and Torres Strait Islander aged under the age of 14 are more than twice as likely to have a disability, and Aboriginal and Torres Strait Islander people aged 35–54 are 2.7 times as likely to have a disability as non-Indigenous people of the same age. 43 Hearing loss and intellectual disability are of particular concern. Aboriginal and Torres Strait Islander children under 15 are 3.4 times more likely to experience profound hearing loss, while all Aboriginal Australians are nearly four times as likely to have an intellectual disability as the general population.

Altogether, Aboriginal and Torres Strait Islander people of all ages are almost twice as likely to need assistance with core activities such as eating and dressing as non-Aboriginal people.⁴⁴ Despite the much higher prevalence of disability among Aboriginal and Torres Strait Islander students, there is often a disconnect between a student's identification with their disability and their culture, and unintended pressure to engage with school and other institutions as

⁴² https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/national-report-onschooling-in-australia-data-portal/school-students-with-disability

⁴³ https://www.abs.gov.au/articles/aboriginal-and-torres-strait-islander-peopledisability#:~:text=Strait%20Islander%20communities-,Disability%20group,%25)%20than%20other%20age%20groups

⁴⁴ Australian Human Rights Commission's Social Justice and Native Title Report 2015 cited in https://www.absec.org.au/supporting-aboriginal-people-with-disability.html

either Aboriginal or as a student with disability, but not as both. This phenomena is encapsulated in the statement below, from a young person named Hayley to the Australian Human Rights Commission:

I grew up without being accepted. I had to choose between my identity as deaf or Aboriginal. I went to a deaf school and I didn't have the same opportunities as my brother and sister to celebrate being Aboriginal. I'm hoping to set up a group where people like me can be proud to be both deaf and Aboriginal without feeling forced to pick one.⁴⁵

The next NSRA must prioritise addressing the drivers of inequity to improve outcomes rather than focusing solely on limited outcome measures which potentially increase inequity. An investment in recurrent public school funding to achieve 100% of SRS for all public schools would also mean that students who are eligible for the six disadvantage loadings would receive the full amount of those loadings, rather than having them proportionally devalued by failure to meet the full SRS. Such an investment would have the immediate effect of reducing class sizes, giving teachers more time to teach and boosting academic achievement, engagement, and skill acquisition. This in turn leads to better life outcomes for individual students but enormous long term benefits to society, the economy and the entire country.

Governments must provide public schools with the technological capacity to engage students who are vulnerable or experience disadvantage

The importance and influence of access to technology and internet connectivity on student outcomes is for many low SES and remote students and is a significant barrier to progress against the three key NSRA domains of academic achievement, engagement, and skill acquisition. The impact of this was not a consideration at the time that the NSRA was signed but must be a key consideration of the next agreement as the gap between students who have adequate access to technology and those who do not will only become more apparent post pandemic.

During the initial COVID-19 related period of remote learning in early 2020 then Federal Education Minister Tehan invoked the impact of remote learning on students who are economically disadvantaged and vulnerable, stating that it "will be the vulnerable, poor, remote and Indigenous students who suffer the most." The Minister was correct that an extended period of remote learning under current funding arrangements and without additional and targeted support has impacted on vulnerable students disproportionally.

The COVID-19 crisis starkly revealed the extent to which many students do not have the ICT equipment they need to engage effectively with school. The provision of the equipment needed during remote learning was largely left to individual schools, not for profit organisations and State and Territory governments.

⁴⁵ Australian Human Rights Commission's Social Justice and Native Title Report 2015 cited in https://www.absec.org.au/supporting-aboriginal-people-with-disability.html

⁴⁶ Hunter, F, "Experts say half of students at risk from long-term remote learning" *The Sydney Morning* Herald, May 2020, retrieved from https://www.smh.com.au/politics/federal/experts-say-half-of-students-at-risk-from-long-term-remote-learning-20200502-p54p7m.html

The Australian Digital Inclusion Index (ADII) covers three core aspects of inclusion: access, affordability and digital ability which includes enthusiasm, confidence and a sense of control when using the internet, as well as experience, skills and knowledge in internet use.

For vulnerable students (and their families and carers), digital inclusion does not happen automatically, even if the students have experience with information and communication technology at school. "Digital Inclusion requires intentional strategies and investments to reduce and eliminate historical, institutional and structural barriers to access and use technology", according to the US National Digital Inclusion Alliance.⁴⁷

A 2020 report showed that there are approximately 125,000 Australian students who do not have internet access at home (including via mobile devices or games consoles) and that public school students were more than twice as likely as either Catholic or Independent school students to have no internet access at home. Further, there are over one million public school students in the bottom third of family incomes and almost 325,000 public school students in very low income families (just over 80% of the total).⁴⁸

As digital ability, affordability and access is critical to student learning, a full digital equity audit and significant further investment in ICT equipment and internet access for students who are vulnerable and disadvantaged is urgently needed to identify the unmet need and to bridge the divide.

In order to begin to address the lack of digital equity and inclusion in Australia's public schools the AEU recommends that the next NSRA should highlight the need for governments to undertake an extensive digital equity audit of their education systems.

These audits should be carried out by States and Territories to nationally set criteria in order to analyse the level of need and provide evidence for comprehensive action plans. The audits would need to take into account the relationship of COVID-19 related remote learning and ongoing disadvantage caused by a lack of digital inclusion to the achievement of students by multiple categories of analysis including home internet access, family income, remoteness, mobility, family type, English proficiency, disability, housing, Aboriginal and Torres Strait Islander status. The audits must have the power to recommend to governments strategies and funding approaches for providing additional support to schools including specific measures to support these groups of students. This will help ensure that digitally excluded students receive the education and access needed to level the playing field with their advantaged peers who have ready access to the ICT equipment and home environment to support their learning.

The circumstances in which students engaged in school since March 2020 have been unprecedented. Investment in thorough digital equity audits with a commitment to act on the findings will enable Australia's public schools to bridge the technology and connectivity gaps, and the huge equity and achievement gaps, that already existed pre COVID-19 and have only increased over the last two and a half years.

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⁴⁷Thomas, J, Barraket, J, Wilson, CK, Rennie, E, Ewing, S, MacDonald, T, 2019, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2019, RMIT University and Swinburne University of Technology, Melbourne, for Telstra, p. 10

⁴⁸ Preston, B., *Digital Inclusion for All Public School Students*, Australian Education Union, 2020, p.9

Information Request 2: Assessing the appropriateness of the National Policy Initiatives

- a. The NSRA (s. 43) provides some guidance on the nature of national initiatives. Are there other principles that should be applied when identifying NPIs suitable for inclusion in a national agreement? What should these be?
- b. What policy areas are best suited to national collaboration and why? Of those, which are best pursued through the NSRA?
- c. Are there ways to maximise the benefits of national collaboration?
- d. Are the three reform directions supporting students, student learning and student achievement; supporting teaching, school leadership and school improvement; and enhancing the national evidence base still the best statement of priorities for reforming schools?
- e. Do the NPIs align well with the reform directions and are they the best opportunities for collaborative reform?
- f. Is there any unfinished business associated with implementing the NPIs that would justify including additional actions in the next national school reform agreement?
- g. Are there other initiatives that would better address key needs or government priorities for schooling?
- h. What policy initiatives (or actions) would be appropriate to include in the next national school reform agreement? Why?

Quality Public education for all is a human right and a public good

This is fundamental to a civil society and speaks to the social purpose of schooling: that it should assist in dismantling inequalities between social groups. Considering that students in Australian public schools reflect the diversity of our modern society: in gender, class, race, ethnicity, and domicile. Thus, Australia's education system must be inclusive and cater for all their learning needs. It must strive to achieve equal and high educational outcomes for all social groups.

The role of schools is to develop all students to be active citizens in a democratic global society with the capacity to participate in the development of society and discussions of ethics and values, as well as to work in a globalised economy. This is for the common good and benefit of all.

Public education is the key to a more equitable, more democratic society. Conversely, inequity in education reinforces inequality and promotes social division.

Education equity is measured by two pillars:

1. Social equity (relative): students from different groups because of their gender, class, race, ethnicity and domicile achieve similar education outcomes to ensure non-discrimination.

2. Adequate education (individual): all children receive an education that enables them to realise their talents and fully participate in adult society in a way of their own choosing.⁴⁹

Thus, it is imperative that any education policy making must place equity as its priority, and a genuine resourced commitment to educational equity. In fact, the preamble statement to this review reminds us:

The objective of the NSRA is that Australian schooling provides a high quality and equitable education for all students. The NSRA sets out long-term national outcomes for school education in Australia and national targets and suboutcomes to track progress.

Currently, the emphasis of the National Policy Initiatives (NPI) serves neither pillar of educational equity. Instead, they drive a narrow agenda on the collection and analysis of individual student achievement, school and system level data.

"The highest-performing education systems across the OECD are those that combine quality with equity." 50

Yet Australia has a policy architecture that denies this principle and is counterproductive to educational equity.

Core elements of a high quality public education system

It is the view of the AEU that the formulation of effective educational policies cannot be achieved without substantial and ongoing input from those educators who are involved in the daily tasks associated with ensuring that students have every chance to learn and grow to their fullest extent. As noted by the Director of the OECD's Programme for International Student Assessment (PISA), Andreas Schleicher,

... one thing is clear, where teachers are not part of the design of effective policies and practices, they won't be effective in their implementation. Education needs to do more to create a teaching profession that owns its professional practice. When teachers feel a sense of ownership over their classrooms and their profession, when students feel a sense of ownership over their learning, that is when productive learning takes place. And when teachers assume that ownership, it is difficult to ask more of them than they ask of themselves. So the answer is to strengthen trust, transparency, professional autonomy and the collaborative culture of the profession all at the same time. ⁵¹

AEU Submission to the Review of the National School Reform Agreement

⁴⁹ Sahlberg, Pasi, Equity and Excellence in School Education, (2022), Presentation to South Australian Secondary Principals Association, https://pasisahlberg.com/wp-content/uploads/2022/03/SASPA-Talk-2022.pdf

⁵⁰ OECD (2012), Equity and Quality in Education: Supporting Disadvantaged Students and Schools, OECD Publishing. http://dx.doi.org/10.1787/9789264130852-en

⁵¹ Andreas Schleicher in Gomendio, M. (2017). *Empowering and Enabling Teachers to Improve Equity and Outcomes for All, International Summit on the teaching Profession, OECD Publishing, Paris.*, p.3

This collaborative approach is supported by Canadian educational researcher, Michael Fullan who identifies the 'crucial elements for whole system reform' as 'intrinsic motivation, instructional improvement, teamwork and "allness". Furthermore, 'the key to system-wide success is to situate the energy of educators and students as the central driving force'. For Fullan, the system is the locus of collaboration, improvement and motivation. To improve, systems need to be guided by an articulate, ambitious and rich set of educational goals. These goals go beyond merely improving achievement measured by standardised test scores; equity, well-being and inclusiveness are all traits that excellent school systems need to pursue. As Fullan points out, these can only be reached by improving the capacity of the system.

The AEU identifies a range of core areas central to improving the capacity of this country's education system and attaining positive social outcomes in education and society:

- Quality teaching, including: fully qualified teachers; systemic support for teachers; continuous professional development; teachers having control over their profession; student centred teaching; sustainable workload.
- Quality learning: including a broad engaging and inclusive curriculum; targeted support for students with additional needs; professional control over student assessment; student centred learning; teaching and learning being at the heart of leadership; needs based funding and fully resourced schools.
- Safe and inclusive schools: employers taking systemic responsibility for teaching and learning conditions to ensure safe and inclusive schools; comprehensive strategies and staffing to ensure student wellbeing; comprehensive strategies and staffing to ensure teacher wellbeing; structured connections with community agencies and programs.
- Workforce planning (addressing supply and demand): a workforce that is diverse and reflective of the community; systemic workforce planning; secure employment; attraction and retention strategies; minimum qualification standards for employees.
- Initial Teacher Education (ITE): 2 year postgraduate degree following 3 year initial degree; capping total enrolments; minimum entry standards; strengthening and raising the status of the practicum component.
- Effective systemic direction and support: strong systemic support for schools, school leaders, teachers and educational support; employers' responsibility for the provision of high quality professional learning; state and territory registration bodies; substantial and qualified non-school based teaching force to support schools through a head office and associated regional structures.

Intimately linked with all these facets of a quality education system are the basic principles of system equity and system resourcing.

For particular consideration of this review is the fact that there are a range of popular policy prescriptions that are either ineffective or even harmful depending on what outcomes are valued and measured in the pursuit of educational excellence. Fullan, outlines some broad characteristics of what he labels the 'wrong drivers' for effective education reform:

 accountability: using test results, and teacher appraisal, to reward or punish teachers and schools vs capacity building;

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⁵² Fullan, M. (2011). *Choosing the wrong drivers for whole system reform*, Centre for Strategic Education. Retrieved from https://michaelfullan.ca/wp-content/uploads/2016/06/13396088160.pdf p.3

- individual teacher and leadership quality: promoting individual vs group solutions;
 and
- fragmented strategies vs integrated or systemic strategies.⁵³

Achieving educational excellence for all students regardless of their backgrounds and/or circumstances requires a strong education system where the formulation of effective education polices is not based upon populist politics and has substantial input from the teaching profession as the central driving force of teaching and learning. That must be a primary focus for the next NSRA.

Impact of early childhood education on school outcomes cannot be understated

The students currently participating in senior secondary schooling are the products of their prior education experiences: in formal education settings in early childhood, primary and middle schooling, together with the experience of living and working within a broad and diverse social environment.

The NPI identifies Senior Secondary Pathways as a priority. The senior years of schooling are essential in enabling students to transition to young adults who are personally successful, economically productive, and actively engaged citizens⁵⁴ To do this,

the senior years need to provide appropriate opportunities, programs, pathways and credentials that link effectively to post-school opportunities. The completion of secondary school marks a major milestone in the lives of young Australians. Completing school is associated with a range of future opportunities, from accessing further education, training and employment to establishing careers and becoming independent⁵⁵.

The NPI intends to improve the outcomes of students at this transition point, however this constructs the senior years of schooling as a singular event and ignores the continuum that is the learning cycle, and the role of schooling as one source of education development in an individual. The importance of the early years is fundamental; the environment and experiences in the early years of a child's life establish their pathways for learning, health, and behaviour. The link between the provision of preschool education and positive school education outcomes cannot be overstated.

The OECD (Starting Strong, 2017) analysed data to investigate the importance of early childhood education on academic outcomes at age 15. Key findings include:

 students who attended early childhood education and care outperformed students who had not;

⁵³ Fullan, op cit, p.5

⁵⁴ https://docs.education.gov.au/documents/alice-springs-mparntwe-education-declaration

⁵⁵ Lamb, S., Huo, S., Walstab, A., Wade, A., Maire, Q., Doecke, E., Jackson, J. & Endekov, Z. (2020). Educational opportunity in Australia 2020: Who succeeds and who misses out. Centre for International Research on Education Systems, Victoria University, for the Mitchell Institute: Melbourne, p 37.

- a child who has no pre-primary education is nearly twice as likely to perform poorly in education than a child who has attended more than one year of pre-primary education; and
- two years of early childhood education is the minimum duration needed to have a good chance of reaching a good level of performance at age 15⁵⁶.

This research represents the significant and growing body of national and international research connecting a child's participation in quality preschool education to future educational outcomes.

Children who participate in high quality early childhood education are more likely to complete year 12 and are less likely to repeat grades or require additional support. High quality early childhood education also has broader impacts; it is linked with higher levels of employment, income and financial security, improved health outcomes and reduced crime. It helps build the skills children will need for the jobs of the future⁵⁷

The evidence is very clear. Children who have access to two years of high-quality preschool delivered by a qualified teacher, start school ready to learn and have a stronger foundation for their future beyond school. Children who attend preschool can expect to achieve greater academic success, have better career prospects, better health outcomes and stronger family and personal relationships. This not only benefits the child and their families, but it ensures a more prosperous and productive future for all Australians.

A NPI on senior secondary outcomes must reflect this reality. It is unrealistic to expect improved senior secondary outcomes, whilst concurrently chronically underfunding and devaluing early years education. The 2014 OECD Education at a Glance report shows that Australia has the lowest expenditure on Early Childhood Education, as a percentage of GDP of any OECD country. Australia spends only 0.1% of GDP compared to the OECD Av 0.6% ⁵⁸.

Historical inconsistencies at the national level and across state and territory systems have given rise to diversity and fragmentation across early childhood services. Structures, resources, ages and entry levels to early childhood education differ across the states and territories and access to high quality preschool education is not equitable in Australia. For example, in New South Wales, the lack of public preschool education freely accessible to all three- and four-year-old children, especially those most educationally vulnerable, is alarming.

The Lifting Our Game report identified the significant additional barriers for attendance and participate facing children from disadvantaged or living in regional and remote locations.

⁵⁶ OECD (2017), *Starting Strong 2017: Key OECD Indicators on Early Childhood Education and Care*, Starting Strong, OECD Publishing, Paris, https://doi.org/10.1787/9789264276116-en.

⁵⁷ Pascoe, Susan & Brennan, Deborah. 2017, *Lifting our game : report of the review to achieve educational excellence in Australian schools through early childhood interventions* [Victorian Government], [Melbourne, Vic], http://nla.gov.au/nla.obj-612290923

⁵⁸ Ibid

Low socio-economics areas typically have fewer childhood education and care services available. This is reflected in the preschool enrolment data:

"As of 2015, all jurisdictions are meeting their preschool enrolment targets of 95 per cent,78 however those who are not enrolled are disproportionately children who are experiencing disadvantage or whose family or community circumstances render them vulnerable to exclusion and disadvantage. Children from a non-English speaking background, Indigenous children, children with a disability, children from remote areas and children residing in the most disadvantaged areas are all less likely to be enrolled than the general population. 59'

A nationally unified approach for the delivery of two years of preschool must be a priority for all governments. Any future National Agreements should facilitate the arrangements for, and commitment to, a nationally consistent rollout of preschool education for all three- and four-year-olds, giving all children the best start to school education.

It is inappropriate to have a NPI that discreetly measures one level of schooling without regard to its inextricable link to the continuum of learning and education development.

Let teachers teach and leaders lead

Education policies should support teacher professional judgment and let teachers teach and leaders lead. Schools and the system operate best on shared values and a common responsibility. For this to occur the system bureaucracy must be closely connected to the culture of public schools. The location of decision making should relate to what is best for student learning across the system. Judgements about the location of decision making will be based on an approach that ensures appropriate systemic resources while allowing each school the flexibility necessary to cater for its unique student community.

The NSRA states that:

"This agreement recognises the competing demands on teachers' and school leaders' time and provides support for them to focus on high quality teaching and leading, maximising student-learning growth. The reforms allow teachers to build on their professional judgement and implement high-impact teaching and learning practices that benefit all students." – p.4

Yet the NPIs appear to have been implemented without the engagement or genuine consultation with the profession, in direct contrast to the above statement and best practice professional principles. The implementation of the Online Formative Assessment is an example of a poor reform process from the current NSRA.

The rapid development of the OFAI reached an advanced stage with no effective consultation with the teaching profession in public schools and its union, the Australian Education Union. This failure to engage effectively with the teaching profession through its representatives has restricted consideration and examination based on evidence of alternatives to a predetermined model that only represents a narrow view of assessment tools.

⁵⁹ Pascoe & Brennan, Lifting Our Game, p 35

The feedback on the OFAI has been sought from a very limited audience, and the consultative process asks for commentary on already devised system and tools. There has been no opportunity to provide input into these tools at the concept or design stages. Despite extensive experience of similar prior initiatives in relation to learning progressions in New South Wales, Western Australia and Queensland, there was a lack of genuine consideration or learning from this.

There are potentially very significant workload implications for teachers. The constant entry and updating of assessment data that will be required by the system to produce reporting outputs is unknown. However, the amount of data output presented in the online prototype demonstrations would require a substantial amount of teacher time and effort to input and update. An absence of detail and clarity on how the Teaching Tool Network will integrate with existing eLearning management systems at school level, and the equity implications that may arise for schools that do not currently have such systems in place. This raises real concerns in regard to equity of access and ease of use of any new online assessment tool for all schools.

Further, the Online Formative Assessment Initiative risks embedding in the national assessment regime significant threats to the teaching profession and the concomitant impacts on our students' achievements and growth.

These include:

- Direct impact on teaching and learning in the classroom.
- Potential increases in total workload and in the distribution of work.
- The potential for systems to mandate OFAI.
- Reductions in professional autonomy.
- Further narrowing of the curriculum.
- The focus of professional learning on the OFAI leading to the displacement of other important professional development activity.
- The reprioritisation of other work in schools.
- Threats to privacy and the commercialisation of assessment data recorded by teachers.
- Potential misuse of collected assessment data for performance management and or publication.

There is significant variation across jurisdictions and some state and territory governments display differing levels of commitment to the implementation of the NPIs and the National Reform Directions. Rather than forcing reforms that do not have the support of all governments, the development of the National Reform Directions should be able to accommodate scrutiny and dissent.

Surveys of AEU members find that teachers feel their professional voices are increasingly silenced in discussions on teaching and learning, and that there is no opportunity to influence or contribute to educational policy design. This is coupled with excessive workloads from top-down mandates and increased administrative and data expectations. This is not unique to one jurisdiction, but rather is replicated across all public education systems in Australia.

The development of the curriculum units in South Australia exemplifies this. As described in the 2020 Progress Report:

Professional learning is being augmented through the development of new R-10 curriculum resources in science, mathematics and technology aligned to the Australian Curriculum. The resources are being released progressively to 2023.

It is our understanding that these resources are developed by expert teacher practitioners and done so with the best intentions for their use and application by other teachers. These resources are written to align to the Australian Curriculum at specific year level, yet without a specific cohort of students. This model assumes a sameness of all students in a year level at a certain point in time and does not consider the breadth of individual learning needs of each student, let alone the educational development gaps. AEU members report that these resources are presented as mandatory and without consultation. The consequences of this top-down approach are foreseeable: it intensifies the workload demand of teachers as they are, often with short notice, compelled to redirect their teaching and learning programme to these 'off-the-shelf' resource units, regardless of the context of the students they teach and learn. A further unfortunate consequence of this NPI is that can drive conflict between teachers and school-based leadership, as they have the managerial responsibility to direct teachers to work in this way. This is unhelpful to building positive school communities, and damages respectful professional collaboration and trust.

It is important to note that the majority of the NPIs were constructed prior to the covid pandemic, and thus written in a context entirely different to the past 2 and a half years of life in Australia.

It is the view of the AEU that the NPIs in their current form are not owned by or for the profession. It seems unlikely that the teachers in the classrooms of public schools would have an in-depth understanding of their purpose, their existence, or the correlation between NPIs and the work demands placed on them.

The workload of teachers is excessive, unsustainable, and unrealistic

Teachers are working harder than ever to deliver high quality public education to larger and more complex classes with fewer resources than should be delivered by the funding of at least 100% of the Schooling Resource Standard (SRS). The teaching workforce is at a point of crisis, as demonstrated by the current daily media reports of widespread teacher shortages. The available data on this matter will be covered more fully under Information Request 3.

A widespread survey of teachers across Australia conducted by Monash University confirms this lived experience:

In particular, teachers expressed frustration with what they saw as unnecessary or overburdening paperwork, administration and reporting. Such tasks were seen as a mechanism for compliance and control of teachers, who expressed a lack of trust in their work.

Despite having a National Teacher Workforce Strategy, it has not translated to a tangible increase in pre-service teachers entering the profession. The issue of attracting teachers to the profession remains. The public and political discourse diminishing the complexity of teaching and misdirecting the angst for educational outcomes on individual "teacher quality", whilst simultaneously denying the impact of educational inequity only compounds the teaching crisis. Trust and respect for teachers must be at the core of educational policy making.

The teaching crisis will not be addressed until there are changes in the following:

- A meaningful reduction in workload.
- Trust and respect for the teaching profession.
- Wellbeing of teachers and students is forefront.
- Fair and reasonable renumeration.

Future education policy must address the above as a matter of priority to ensure Australia has the teaching workforce to accompany the increasing student enrolment.

Make equity the priority in education policy

There is no doubt that national collaboration on a system architecture to deliver on our shared education goals is of primary importance to society. Excellence in education cannot be separated from equity, both in opportunity and outcomes. From Hobart in 1998, through to the Mparntwe Declaration: equity has been foremost of our education goals. Yet the NPIs, and the subsequent system documentation and goals that are derived from the NPIs, are not orientated towards equity. The overriding impact of the NPIs on schools has been negative, unnecessary, and harmful to the purpose of education.

"One of the persistent challenges confronting societies is how to reduce inequalities in the educational and occupational attainment of students from different socioeconomic, ethnic and race group backgrounds." - Kevin Marjoribanks (2002)

The design of a National Education Policy Architecture must place educational equity at its centre, and demand system accountability for the conditions of educational equity: social equity and adequate education. Subsequently, the data collection, analysis and reporting must shift to measuring equity, including analytic assessment of funding and its impact on increasing or reducing equity.

National education policy should involve collaboration between the State/Territory and Federal governments and exist within a framework that enables schools and teachers to exercise their professional judgement and the flexibility to find the most appropriate solutions at the school level. This should not detract from the capacity for innovation in curriculum and assessment at the system and school levels nor lead to over standardisation. This must be led by the profession, as the experts with the content knowledge and experience, and responsibility for implementation.

Information Request 3: Assessing the effectiveness of the National Policy Initiatives

- a. Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?
- b. Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?
- c. Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?
- d. Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?

The effectiveness of each NPI is considered below, with the exception of the assessment NPI, the workload and administrative impacts of which are discussed at length earlier in this submission and in Information Request 4.

The State School Teachers' Union of Western Australia (SSTUWA) has provided a comprehensive response to Information Request 3 that is attached as *Appendix 1* to this submission.

The Australian Curriculum

The AEU supports the Aboriginal and Torres Strait Islander Histories and Cultures cross-curriculum priority and the inclusion of Aboriginal and Torres Strait Islander perspectives into the mandatory key learning areas and non-mandatory content elaborations.

The AEU believes that students should have the opportunity to learn about the unique first cultures of this land. Including this cross-curriculum priority is about broadening students' perspectives and suggesting ways teachers can use content to support students to understand First Nations perspectives. Ensuring that Aboriginal and Torres Strait Islander students have the opportunity to see themselves and their experiences reflected in the curriculum is also a critical element of this work.

In regard to the overarching aim of the recent Review to declutter the Australian Curriculum, feedback from Queensland, which is the only jurisdiction to implement the Australian Curriculum in full, suggests that the changes have not succeeded in this aim. The AEU has had numerous reports from teachers in Queensland that they are concerned about the workload implications of implementing the identified curriculum changes, and that there has been very little in reduction of the cluttered curriculum, which is unlikely to improve student outcomes.

Senior secondary pathways into work, further education and training

In the introduction to the 2020 Review of Senior Secondary Student Pathways, Professor Peter Shergold rightly states that "present transition pathways presented to young adults at school are too often framed in a manner that they perceive to narrow choice." An analysis by NCVER of a decade of the Longitudinal Surveys of Australian Youth (LSAY) data, which tracked the 2006 cohort of 15 year olds until age 25, showed that the pathways chosen in senior secondary school have long term, and often lifelong social and economic implications, not only for individuals but for the whole of society. The variety and complexity of many young people's pathways from education to work demonstrates how invaluable a properly funded and supported public senior secondary school and vocational education system is.

Pathways are to a large extent frequently determined by young people's Socio-Economic Status (SES), by location and level of remoteness, level of disadvantage across numerous realms and by whether students undertook vocational subjects during secondary school. The breakdown of number and type of transitions and the employment rate at age 25, and the much higher number of transitions between education, work and disengagement from vulnerable youth, those with the highest levels of disability, early school leavers and from the lowest SES households.⁶²

It is essential that young people from all locations across Australia and from all backgrounds have access to all available post school pathways so that they are able to explore all options and choose the most appropriate one for them, without restriction. The Shergold Review made some important recommendations in this regard in relation to informed decision making and quality career guidance, on the need to ensure that all students are provided with equal opportunities for success and on ensuring that vocational education provided in schools must be of a high standard and the need to improve the esteem in which VET pathways are held, but it was largely silent on the resourcing required to make these changes.⁶³

To ensure that all senior secondary students have access to appropriate pathways there must be restoration of a properly funded and fully accessible public TAFE system. Yet the most recent funding data from the Report on Government Services shows that total government funding to vocational education has fallen from over \$1 billion from the 2012 benchmark every year since 2013.⁶⁴ The AEU made numerous recommendations to the Shergold Review in 2020, and we restate them here as being essential to ensuring that the aims of the Review are fulfilled:

The provision of VET to secondary school students should be underpinned by cooperative arrangements between schools and TAFE, the public provider of vocational education.

⁶⁰ Shergold, et. al, Looking to the Future - *Report of the review of senior secondary pathways into work, further education and training pathways*. 2020, p.6.

⁶¹ Ranasinghe, R, Chew, E, Knight, G & Siekmann, G., School- to-Work Pathways, NCVER, 2019, p6.

⁶² *Ibid*, p.19

⁶³ Shergold, et. al, Op. cit., p20-21.

⁶⁴ Productivity Commission, *Report on Government Services 2022*, Table 5A.1, retrieved from https://www.pc.gov.au/research/ongoing/report-on-government-services/2022/child-care-education-and-training

- VET in Schools should be funded from a specific budget directed to TAFE for that purpose rather than provided by for profit RTOs diverting resources from public schools, and/or requiring students to fund provision themselves through additional charges.
- Funding for TAFE must be increased and allocated in order to support services provided to schools so that schools and students are not denied access due to cost.
- Class sizes for VET in Schools should not exceed those for the same course in a TAFE college.
- Any person delivering VET in schools should have a sound understanding of pedagogical principles, including the importance of consolidation and context for learning, should be properly qualified to deliver VET and meet state and territory registration requirements.
- That state and territory education departments fund qualified and registered teachers as careers advisors for senior secondary students, with each student having access to a named advisor who knows them.

Reviewing the Teacher Workforce and strengthening the Initial Teacher Education System.

The national teacher shortage has been building for years, and AEU members experience the impact of it every day. Student enrolment projections from the Department of Education, Skills and Employment predict that an additional 345,000 students will be enrolled in Australian schools by 2029⁶⁵, and 2019 employment projections produced by the National Skills Commission showed that demand for school teachers was expected to increase by 10.2% (or 42,600 new jobs) over the five years to May 2024, above the average projected growth rate across all occupations of 8.3%. ⁶⁶ In New South Wales alone an additional 11,000 teachers will be needed over the next decade, and this increases to an additional 13,750 teachers if student teacher ratios were to be maintained at the national average. ⁶⁷

AITSL estimates that non-retirement attrition could be 14% over the next 10 years, and that "will not be sufficient to replace retirement loss over the next five to ten years" and the AEU's 2020 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.

⁶⁵ Senate Standing Committees on Education and Employment, QUESTION ON NOTICE, Additional Estimates 2019 – 2020, Outcome: Schools, Department of Education, Skills and Employment. Question No. SQ20-000156, Projections for enrolments in schools

⁶⁶ Australian Government Labour Market Information Portal (Senate Question on Notice SQ20-001980)

⁶⁷ Rorris, R., *NSW Public Schools to 2031: Impact of Enrolment Growth on Demand for Teachers*, retrieved from https://www.nswtf.org.au/files/rorris-report.pdf

The recent Quality Initial Teacher Education Review Report rightly identified as its primary recommendation the need to raise the status of teaching. In order to do this and to attract high quality candidates into teaching 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.⁶⁸ 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 progression over time which leads to shortages, attrition and difficulties in recruitment, particularly for teachers in Science, Technology, and Engineering and Mathematics (STEM) subjects.

Although pay is not the sole determining factor in the attractiveness or otherwise of any profession, it nonetheless is a significant consideration, and in Australia teaching has failed to keep pace with other professional occupations requiring similar levels of qualification and skill. One example of this is the artificial wage "cap" imposed on teachers' salaries by numerous state governments which has had a substantial and ongoing impact on the status and attractiveness of the teaching profession. There are also significant limitations to teachers' pay that reduce the attractiveness of the profession to high performing secondary students and university graduates from in demand disciplines.

The career and salary progression structure for teachers in most states and territories creates a severe disincentive for students to consider a career in teaching. The relatively narrow interval between graduate salaries and those of the most experienced teachers has the effect of forcing a decline in salary, relative to other professions, as experience and expertise increases.⁶⁹ This contrasts with evidence from a study of teachers' salaries in 30 countries that shows that the salaries of experienced teachers relative to other comparable professions distinguishes countries with high levels of student achievement from others. In Australia, by contrast, teachers' salaries have stagnated, particularly at the "flat" top end of the scale in existing salary structures, which research has shown discourages potentially good teachers from entering the profession. ⁷⁰

⁶⁸Chevalier, 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

⁶⁹ Ingvarson, L., Reid, K., Buckley, S., Kleinhenz, E., Masters, G., Rowley, G. (2014). Best Practice Teacher Education Programs and Australia's Own Programs. Canberra: Department of Education, p.47.

⁷⁰ Akiba, M., Ciu, Y., Shimizu, K., & Lang, G. (2012). Teacher salary and student achievement: A crossnational analysis of 30 countries. International Journal of Educational Research, 53, 171-181.cited in Ingvarson et. al, *Op.cit.* p.47

The 2021 independent inquiry *Valuing the Teaching Profession* made the following observations on the increased challenge inherent to teaching in recent decades and found that increased complexity has not been met by improvements to pay:

"The Panel is of the view the evidence from teachers and experts is persuasive in arguing that ... there has been a markedly significant change in teachers' work. All aspects of the work of teachers has grown in volume and complexity.⁷¹

"At the same time as these increases in work, complexity and responsibility there has been a decline in the relative position of teacher salaries alongside that of other professions and a reduced attractiveness of public sector teaching as a career; this being a contradiction that needs urgent attention by way of a significant upgrade in teacher salaries and an improvement in career options." 72

Further, the Inquiry's Chair the Hon. Dr Geoff Gallop sounded the alarm on the short- and medium-term impact of the imbalance created by the failure of teaching's pay structures to keep up with the demands of the profession.

"Taken with the fragile and inadequate staffing mechanisms currently in place, the salary levels in place and projected for the next three to five years are dangerous for the public standing of the profession, and for the quality of education available to the students of the state's [NSW] public schools."⁷³

A decade ago the Productivity Commission report on the schools workforce recognised this as a major issue for the attractiveness of teaching as a profession, noting that in most states and territories teachers will reach the top of the pay scale in around a decade, and (citing the Australian Bureau of Statistics and the OECD) concluded that "average weekly ordinary time earnings in the broader education sector are now only about 7% above the average for all surveyed industries, compared with 14% in 1994. Moreover, there is evidence that salaries at the top of teacher pay scales did not increase in real terms between 1995 and 2009."⁷⁴ At that time the ratio between the top of the salary scale and teachers' starting salaries in Australia was approximately 1.4, significantly lower than the OECD average of just over 1.6.75 More recently the gap has further widened and Education at a Glance: OECD Indicators 2020 shows that whilst the OECD average ratio at the top of the scale has increased to 1.7 times starting salary, in Australia nothing has changed, with the average salary for Australian teachers stuck at 1.4 times starting salary. ⁷⁶ This means that unlike most OECD countries where experienced teachers continue to be rewarded through pay progression well into their careers, in Australia a teacher can spend most (and potentially up to three quarters) of their career at the top of the salary scale without access to pay progression.

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⁷¹ Gallop, G., Kavanagh, T. & Lee, P., Valuing the Teaching Profession: An Independent Inquiry, 2021, p.126

⁷² *Ibid.* p.9.

⁷³ *Ibid.* p.133.

⁷⁴ Productivity Commission (2012), Schools Workforce, Research Report, Canberra. p5

⁷⁵ *Ibid.*, p111

⁷⁶ Retrieved from OECD Statistics Education and Training

Workload has been the number one issue for teachers for many years, and multiple studies shows that teachers regularly work 55-60 hours per week. Most recently AITSL found teachers work an average of 57 hours a week including 34 hours on non-teaching tasks with student and teaching related tasks consumed 43% of the time spent on non-teaching tasks, comprised of planning lessons (26%) and marking/assessing student work (17%).

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.⁷⁷ 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 they work an average of 53 hours per week.⁷⁸

In the 2021 Victorian workload survey, only 14% of teachers said that 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. 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 that 73% of experienced teachers who are considering leaving the profession prior to retirement 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 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" and that it is difficult to attract high performing graduates to a career there they are currently under paid, over worked and have their professional autonomy continuously undermined.

Australian Education Research Organisation

There is no doubt that an organisation that gathers rigorously evaluated and evidence-based practical resources for teachers could be a useful resource for teachers to review and refine their practice. However, the usefulness of such an organisation is entirely dependent on the diversity and experience of those developing the policy, and a commitment to the consultation and inclusion of the views of the teaching profession must be the first priority.

⁷⁷ 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

⁷⁸ 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

⁷⁹ Weldon, P. & Ingvarson, L. (2016), *School Staff Workload Survey: Final Report to the Australian Education Union Victorian Branch*, p.38

⁸⁰ NSW People Matter Employee Survey 2020, retrieved from https://www.psc.nsw.gov.au/reports-and-data/people-matter-employee-survey/pmes-2020

The AEU is concerned that there is minimal representation from the teaching profession on the AERO board. The AEU therefore recommends that the next NSRA ensures proper representation on the AERO Board from the teaching profession via its unions.

Information Request 4: *Measurement Framework and performance indicators*

- a. Does the performance reporting framework in the National School Reform Agreement (NSRA) embody the 'right' mix of objectives, outcomes, targets and sub-outcomes for inclusion in a future agreement?
- b. Do the objectives, outcomes, targets and sub-outcomes in the NSRA align with the aspirations set out in other key documents such as the Alice Springs (Mparntwe) Education Declaration?
- c. Does the Measurement Framework for Schooling in Australia provide a relevant, reliable and complete picture of progress towards achieving the outcomes of the NSRA?
- d. Are there performance indicators not included in the Measurement Framework that would help provide a more relevant, reliable and complete picture of student outcomes, both as identified within the NSRA and more broadly?
- e. Are there impediments to governments adopting these indicators (for example, data availability, cost)?

The AEU believes that the objectives, targets and outcomes of the next NSRA must be defined in consultation with teachers and with clear benefit for teachers and students before they and subsequent performance indicators are set. We note that the NSRA specifies that "as far as practical reporting requirements under this Agreement and the Act will leverage existing reporting processes and data sources and minimise reporting burdens on school systems and individual schools" but note that prior to the signing of the 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.

There is limited alignment between the NSRA and the key objectives, outcomes and targets and the communities that are directly impacted by them. The next iteration of the performance 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 of the next agreement.

The current NSRA was significantly constrained by the failure of all governments to adequately consult with the teaching profession prior to setting the measurement framework and performance indicators. As such, the Measurement Framework for Schooling in Australia does not provide a complete picture of whether or not outcomes have been achieved through the NSRA. 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.

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⁸¹ National School Reform Agreement, *Op. cit.*, p.11.

Many of the performance measurements cited by States and Territories in their annual reports are heavily reliant on NAPLAN, a single test in time assessment that is not fit for purpose with an inequitable application nation-wide.

Simplistic accountability frameworks that pit schools against each other and, through the mechanism of parental choice, create divisions between schools, reflect and maintain broader social inequalities. In this context, the relationship between what is taught and what is measured in the name of accountability is detrimental to both school quality and equity. There is strong evidence that an over-reliance on high-stakes, standardised tests is detrimental to disadvantaged students. Some of the reasons are outlined by Morgan, based on testing required by the No Child Left Behind policy in the USA:

Since teachers face pressure to improve scores and since poverty-stricken students generally underperform on high-stakes tests, schools serving low-income students are more likely to implement a style of teaching based on drilling and memorization that leads to little learning. This form of instruction leaves few opportunities for disadvantaged students to make progress and contributes to unscrupulous practices, such as lowering proficiency scores, holding students back to prevent them from taking tests, and even falsifying students' scores⁸².

The AEU asserts that NAPLAN has:

- Narrowed the range and depth of curriculum in many of the nation's classrooms.
- Increased the high stakes nature of assessment and prioritised NAPLAN above other forms of assessment and reporting.
- Had a significant and detrimental impact on the wellbeing of the education community.
- Had a range of negative outcomes related to its use, including as the dominant performance measure for schools, leaders, teachers and students and subsequent basis for systemic funding decisions.
- Caused a culture of shaming teachers, principals, vulnerable children and communities through the decontextualized reporting of NAPLAN results

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.
- 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.

⁸² Morgan, H. (2016). Relying on High-Stakes Standardized Tests to Evaluate Schools and Teachers: *A Bad Idea, The Clearing House: A Journal of Educational Strategies, Issues and Ideas* Vol. 89, Issue 2. Retrieved from http://www.tandfonline.com/doi/full/10.1080/00098655.2016.1156628

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.

As such, 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

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. Specifically, goal 2 of the Declaration provides limited data collection to ensure that the range of key performance measures are met, including those focused on developing stronger partnerships, strengthening early childhood education, lifelong learning, and effective transitions, and supporting all young people at risk of educational disadvantage.

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.

Other key measurements 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.

Conclusion

A strong and inclusive public education system is the only guarantee that all Australia school students are able to access the quality of education they deserve and require in the face of rapidly changing social, economic and ecological contexts. As shown above, in order for governments to implement effective educational reforms they must implement changes at a system level rather than isolating individual schools and teachers. This is not to say that effective education policy must be top-down, and one-size-fits all. As Fullan notes,

The key to system-wide success is to situate the energy of educators and students as the central driving force. This means aligning the goals of reform and the intrinsic motivation of participants...Policies and strategies that do not foster such strong intrinsic motivation across the whole system cannot be a source of whole system reform. Furthermore, strategies that do not develop increased capability (the skills to do something well) are similarly destined to failure. In other words, both strong motivation and enhanced skills on a very large scale are required.⁸³

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⁸³ Fullan, op cit, p.3

The conditions in which this collective motivation and capability can develop and thrive are characterised by high levels of trust and an acknowledgement that the teaching profession needs sufficient time and the appropriate resources to ensure that every student can reach their full potential.

That is the challenge which must be met by the next National School Reform Agreement.

Recommendations:

The AEU strongly recommends that the next National School Reform Agreement must:

- 1. Address the impact of the recurrent funding shortfall which diminishes the ability of public schools to comply with the Reform Directions and National Performance Indicators 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.
- 2. Explicitly state that all governments must meet their obligations and responsibilities to ensure that Australia's public education systems are properly resourced.
- 3. Monitor the efforts of all governments towards the achievement of Schooling Resource Standard goals as an accountability measure of the next round of bilateral agreements.
- 4. Address the drivers of inequity to improve outcomes rather than focusing solely on limited and process-based outcome measures.
- 5. Embed the recommendations of the 5th National Aboriginal and Torres Strait Islander Education Conference (NATSIEC) in 2018 in the NPIs of the next NSRA, including:
 - a. The establishment of a community-led independent Aboriginal and Torres Strait Islander Education Institute to identify and promote evidence and best practice, monitor integrity and effectiveness of Indigenous education policy and practice.
 - b. 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.
 - c. The recommitment of all Australian Education Ministers to a more equitable ratio of Indigenous workforce to the Aboriginal and Torres Strait Islander students they support, as agreed by all Australian Education Ministers in 2015.
 - d. That jurisdictions ensure quality teaching and compliance with the mandatory elements of Aboriginal and Torres Strait Islander Histories and Cultures in the Australian Curriculum. Teacher ignorance or anxiety should not relegate learning about First Nation cultures to the margins of school curriculum or higher education studies.
 - e. That the Indigenous Advancement Strategy Children and Schooling program is reinstated to the Commonwealth Government education portfolio to ensure improved integration with education sector policy, delivery and accountability.

- f. That significantly increased levels of funding transparency, links to evidence, and accountability of Indigenous education expenditure, complementary and discrete to mainstream funding are made available.
- 6. Urgently address the lack of public secondary school provision for Aboriginal and Torres Strait Islander students in remote communities.
- 7. Address the education needs of students with disability to provide the best possible opportunity in education by including at least the following in the next NSRA:
 - a. Governments must ensure that students with disability have access to a broad range of education settings to meet the social, physical, well-being, and educational needs of all students.
 - b. The Commonwealth must undertake a further review of loading mechanisms for students with disability to determine the real costs of ensuring that all students with disability can access a high-quality education regardless of learning environment.
 - c. Governments must ensure that staffing allocations genuinely reflect the appropriate staff/student ratios and provide the funding needed for the development of individual learning plans for students with disability. This includes the provision of teacher relief to cover classes while teachers develop, implement, monitor and review individual learning plans.
 - d. Governments must provide an allocation of additional teacher resource and/or education support staff hours to support students with disability.
 - e. The Commonwealth must undertake a review of the Nationally Consistent Collection of Data (NCCD) to ensure that the tools accurately captures the extent of a students disability including by allowing multiple and complex disabilities to be identified.
 - f. All governments must ensure that all public schools have the resource and staff capacity required to assess the needs of students with disability and engage with the NCCD process.
- 8. Address the lack of digital equity and inclusion in Australia's public schools by requiring governments to undertake an extensive digital equity audit of their education systems to determine what investment in ICT equipment and internet access is needed for students who are vulnerable and disadvantaged, to identify the unmet needs that must be resolved to bridge the digital divide.
- 9. Ensure that the aims of the 2020 Senior Secondary Pathways Review regarding the provision of Vocational Education and Training (VET) in schools are realised by:
 - a. The provision of VET to secondary school students through cooperative arrangements between schools and TAFE, the public provider of vocational education.
 - b. Funding VET in Schools from a specific budget directed to TAFE for that purpose.
 - c. Increased funding for TAFE to provide fee-free VET to schools and students.
 - d. Ensuring that class sizes for VET in Schools do not exceed those for the same course in a TAFE college.

- e. Ensuring that any person delivering VET in schools has a sound understanding of pedagogical principles, including the importance of consolidation and context for learning, is properly qualified to deliver VET, and meets state and territory registration requirements.
- f. State and Territory must fund qualified and registered teachers as careers advisors for senior secondary students, with each student having access to a named advisor who knows them.
- 10. 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. Teacher workload, the additional resources required, and professional respect must be at the forefront of any changes that are subject to consultation with the AEU.
- 11. Develop a national framework for states and territories to regularly and consistently report on the level and impact of ongoing teacher shortages, and how they are addressing teacher shortages. The latter should be a primary performance indicator of the next NSRA. Key measurements 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.
 - The rate of secure employment for teachers (particularly for early career teachers).
 - The experience of graduate teachers in their transition to the workforce.
 - 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.

National Policy Initiative

Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?

Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?

Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?

Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?

Enhance the Australian Curriculum to support teacher assessment of student attainment and growth against clear descriptors There is no evidence that the NPIs have been achieved in WA.

The Australian Curriculum (AC) have been adapted and curriculum support materials developed for teachers by WA's School Curriculum and Standards Authority (SCSA).

Due to the ad-hoc nature of the development, and limited consultation, of this NPI, only a handful of educators in WA are aware of the NLNLP and the Teacher Tool Network (TTN).

There is little appetite to engage with learning progressions (NLNLP) after the unsuccessful implementation of the Student Outcome Statements (SOS) in WA. The outcome statements and learning progressions both show growth against descriptors and are similar in construction.

The Western Australian experience of SOS showed no measurable improvement for students in both primary and secondary schools.

Anecdotal evidence suggests the SOS were not feasible for some cohorts e.g. secondary and ECE students, disability.

Teachers and parents found the concept of achievement extremely difficult to determine/understand as the outcomes were untimed i.e. not

There are numerous barriers to finalising the implementation of the National Literacy and Numeracy Learning Progressions (NLNLP).

Literacy and numeracy are inherently different to English and mathematics. Are we setting teachers, schools and parents up for failure with this misconception to begin with?

There is a lack of empirical evidence underpinning the NLNLP and milestones. This may put our systems, schools and teachers at risk when making judgements against student progress and achievement using these tools.

NLNLPs are not aligned against the current Australian Curriculum (AC) nor the adaptations developed by each state and territory. The continuous changes and updates will put enormous pressure on teachers and schools.

-NLNLPs are 'best fit' in terms of the AC and lots of gaps have been identified. Teachers will find this extremely frustrating and time consuming and will lead to inaccurate reporting and invalid student learner profiles.

The implementation of the NLNLP and the adapted AC will coincide, and this means a huge workload for teachers and schools to keep up to date with both sets of changes. --

There has been minimal consultation with all stakeholders including the disability sector, and rural and remote school communities.

There is great concern in terms of equity and inclusivity with learning progressions as very little has been shared with these education bodies.

A lot of questions remain in terms of the functionality of NLNLP especially for students with disability, EALD and Indigenous. Little work has been done for these cohorts. Questions are regularly asked on how you measure growth against a standard for a student with a disability.

Increased workload proved to be a major impediment to the implementation of the outcomes in WA and consideration needs to be given to workload for teachers with cohorts described above as well as small district secondary schools and multi-age classrooms.

Access to technology for teachers in rural and remote areas can be problematic for them and their schools, thus increasing pressure upon them.

This would also be true for beginning teachers who would not have access to this information during their pre-service training.

Given WA's previous experiences with outcomes based upon formative assessment, we do not see any potential improvement across the country with the implementation of the NPIs in their current forms.

Not in WA; with the introduction of another outcomes-based system (NLNLP), there is a danger we will lose any gains we have made since then particularly with the introduction of Brightpath – a predominantly formative tracking system for English and mathematics.

NLNLP will narrow the curriculum, teachers will teach to the test as the AC and NLNLP are overcrowded and too complex.

There is also the danger that these initiatives will de-skill the teaching force. Teachers will be making judgements against the NLNLPs and will use the assessment tools from the Teacher Tool Network (TTN). They will lose the skills to design assessments to meet the specific needs of their cohort. Beginning teachers or teachers working outside their speciality will be particularly at risk.

There is a huge danger of assessment/data driven teaching and learning programs.

d short or medium such as States and	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more	Taken as a whole, are the reforms se out in the NSRA likely to improve student outcomes in the future?
	implementation)? If so, how could governments address these?	tailored measures required?	
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National Policy Initiative	

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Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?

Assist teachers to monitor individual student progress and identify learning needs through opt-in and on demand student learning assessment tools At this stage there is no evidence of large numbers of teachers, or whole schools using the TTN assessment tools.

Due to the ad-hoc nature of the development, and limited consultation, of this NPI, only a handful of educators in WA are aware of the NLNLP and the TTN.

There is little appetite in WA schools for these assessment tools as schools have invested the years since the SOS in working with teachers to develop a consistent and comparable approach to assessment using the tools provided by SCSA.

It has taken WA teachers 10 years to understand and implement the WA curriculum (AC adapted for WA context) and assess its content in a meaningful, consistent and comparable way.

They are now confident in using the WA curriculum and the assessment tools designed for our curriculum and student cohorts by SCSA e.g. moderation tools, curriculum resource materials and Brightpath.

SCSA is unifying WA schools by implementing professional learning seminars designed to improve teacher understanding of the WA curriculum, and assessment of the concepts taught.

There has been a distinct lack of consultation and negotiation with the Online Formative Assessment Initiative (OFAI). Not all voices are being represented in the discussion. This lack of consultation prevents true national collaboration.

The biggest barrier has been the process of developing the OFAI. There has been no real consultation (e.g. asking if you prefer a red or blue background is NOT consultation).

The notion of "opt-in" to use the TTN is an issue when a lot of the rhetoric contradicts the "opt-in" concept. If only some schools are using the TTN and it is tailored to their system's adaptations, then what is the purpose of the NEI?

Implementing a common understanding of the NLNLP will be problematical with each state / territory adapting the AC to fit their contexts.

Consistency and comparability of teacher judgements across states/territories/schools will not be achievable with multiple adaptations to the AC.

Considerable funding would need to be made available to provide time for schools and teachers to develop an understanding of formative assessment, AC and The learning progressions are for literacy and numeracy and are not granular for students with a disability. Descriptors for foundational skills are needed for this cohort.

The NLNLP will be more useable with more capable students but not students with low literacy and numeracy skills. These students are ones more likely to need the system the most.

The TTN has the potential to narrow the curriculum for students without strong links to pedagogy.

We need creative and divergent thinkers NOT children and members of society that fit into a box.

The Critical and Creative Thinking General Capabilities must be a priority in every classroom for contemporary learners.

If private vendors are contributing education content to the TTN then someone needs to ensure that items are linked to the AC/NLNLP and based upon empirical evidence. Student outcomes will not improve if there is no rigour inbuilt into the TTN.

There will be increased pressure on teachers as parents and students will have access to the TTN. Teachers will have to spend additional time uploading assessment results to TTN and will be continuously communicating with parents instead designing and teaching quality lessons for their student cohort.

It has been suggested that fortnightly tests may become part of this tracking system through the TTN. This will increase teaching to the test and how to take a test. Therefore, what is the use of this

INFORMATION REQUEST 3: ASSESSING THE EFFECTIVENESS OF THE NATIONAL POLICY INITIATIVES						
National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?		
	As the workload on teachers for assessment is already significant, teachers should not be required to specifically measure the 'soft skills' or general capabilities or be required to specifically report upon them.	NLNLPs. In addition, schools would need to spend time moderating within and across schools, to ensure the consistent implementation of this measurement tool. Considerable work needs to be done to develop the signposts, milestones, scales (standards) that will provide parents information on whether a student's progress is "good enough" for a particular year level. The NLNLP milestones are not a good fit to year levels, and this will add to the difficulty for parents to understand their child's progress and achievement in the school report. Reporting to parents will be a major challenge. Parents will need to be consulted and informed on what this new reporting progress and achievement tool looks like, and in their use. Teacher training institutions are not preparing pre-service teachers in the use of formative assessment and are not aware of pending changes. This will put additional pressure on schools when working with beginning teachers. A major concern is the involvement of private vendors in contributing items to the TTN. This will mean		data? We should be focusing on quality teaching.		

	FORMATION REQUEST 3: ASSE			
National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?
		not be based upon empirical evidence and may not align to the AC. Who will quality assure the contributions to the TTN?		
		The contributions of private vendors could also see a narrowing of the curriculum and a focus on fluency not problem-solving and critical and creative thinking. They are not educators.		
		There are many elements in the Measurement Framework that cannot be implemented equitably across the country given the variations of curriculum, and data collection systems in each state and territory, and jurisdiction. The data will be invalid and lead to unethical comparisons between schools and systems.		
		The concept of evidence (NLNLP) needs to be explored further: the artifacts – what and how much, and teacher judgements – consistency and comparability.		
		It has been suggested that once teacher evidence is uploaded onto the TTN, a judgment about achievement is generated through an algorithm in the program. This will create massive inconsistences in the outcomes for students and		
		will increase expectations on teachers to upload copious amounts of evidence per student. This process will de-value and de- skill teachers and schools.		

IINI	DINIMATION NEGOEST 3. ASSE		OF THE NATIONAL POLICITIN	TIATIVES
National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?
	T			
Review senior secondary	This not currently occurring as	Students and schools don't have	No, schools do not have equal	No, they state that they are

Review senior secondary pathways into work, further education and training

there is limited access to TAFE courses and RTOs in many secondary schools e.g. rural and remote areas and small country and metropolitan areas

The curriculum for senior students in WA already allows students to have adequate choice in their senior pathways and entry to university can be attained by pathways other than through university entrance exams.

There is no support for any model for community service (such as previous model) which created additional workload on schools in collecting, collating and recording data.

Students and schools don't have the same access in regions to vocational education and university entrance specialist (subject) teachers e.g. Year 11 and 12 physics teachers, and TAFE and Registered Training Organisations (RTO).

The changes recommended through the Shergold Report will be hard to implement without appropriate funding and changes to existing curriculum. This is particularly relevant in the area career education / guidance.

Engagement in workplace learning or enrolment in applied courses should be through the choice of the student and parent and not be a compulsory requirement.

We do not support a removal or reduction of a school's ability to offer VET courses, and do not support the replacement of VET with micro credentials.

Micro credentials should not replace VET and must be adequately funded and resourced before (voluntary) implementation in schools is considered.

Schools cannot implement everything in the Shergold Report, they can only be expected to act in the best interests of their students within constraints of practicality e.g. working with industry.

No, schools do not have equal opportunities and access to specialist staff and industry. Regional schools especially small district high schools work hard but it is difficult to attract specialist personnel e.g. physics teachers.

Programs for students with disabilities need to be expanded and programs provided/funded through a centralised system (not NDIS).

Alternative programs/pathways need to be tailored for implementation in small country towns as well as the metropolitan area.

Should expand support for the regions through more flexible School of Isolated and Distant Education options / funding District High Schools should be part of this review.

Paid Apprenticeships should be considered to supplement income for students who are key workers and provide for their families e.g. kids from low SEI schools / EALD, indigenous students who supplement the family income.

Expand model of community partnerships "Alumni" for high flying kids, pathways to specific industries and partnerships.

No, they state that they are inclusive of equity cohorts but are not practical nor achievable in many contexts: regional students, students with a disability, as well as EALD and Indigenous students. Many small schools do not have the numbers / funding to attract qualified staff.

See column on left.

An increase in compulsory testing in literacy, numeracy and digital literacy for senior secondary students will not lead to improved outcomes. Any further testing should be at the discretion of the schools.

Schools can put individual plans in place for students with a disability before they leave school but should not be held responsible for the success of this plans during implementation. This should be the responsibility of post-school agencies.

National Policy Initiative	Is there evidence that the NPIs have	Are there any major barriers to	Are the NPIs (likely to be) equally	Taken as a whole, are the reforms set
ranona i oney innauro	achieved expected short or medium	realising the benefits of the NPIs	effective for all student cohorts,	out in the NSRA likely to improve
	term outcomes (such as States and	(including barriers to finalising	including equity cohorts, or are more	student outcomes in the future?
	Territories, schools or teachers using	implementation)? If so, how could	tailored measures required?	
	resources produced by the NPIs)?	governments address these?	·	
		Consideration needs to be given to	Adequate funding must be made	
		who will collect, collate and record	available for all schools to access	
		data. With students moving	the required tuition for students in	
		between school and community /	equity cohorts.	
		industry, it is not possible for the		
		school to be responsible for all the	Schools should not be expected to	
		data collection, collation and	provide free education and training	
		recording.	for older students who have left	
			school. Senior Colleges should be	
		With so many agencies involved	appropriately funded for this cohort.	
		with the data, it is imperative that		
		•		
		rigorous processes are in place to		
		safeguard its authenticity.		
		Operation was de to be about to		
		Consideration needs to be given to		
		the security and privacy of the data		
		collected, collated and recorded by		
		schools and other agencies.		

National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?
Review teacher workforce needs of the future to attract and retain the best and brightest to the teaching profession and attract teachers to areas of need	No, there is no evidence of this happening. There is no collaborative approach to attracting teachers from universities, and state and school systems. There is a distinct lack of teachers entering the profession. With the NLNLP, there is a fear that teachers will become de-skilled and teach to the test. There is also the fear that teachers' performance will be "measured" by the data uploaded against student progress in the TTN. The use of the data is open to system abuse (schools, departments, government). The brightest teacher does not always mean you have the best teacher. Consideration needs to be given to an aptitude test / interview. NLNLPs could have a huge impact on attracting and retaining teachers into the workforce due to the workload involved. Having parents over-engaged in student learning is bad enough now without giving them a licence,	Should there be a National Teacher Registration system so that we have increased mobility and shared expertise across the country? Is it possible with differing governing bodies in each state and territory? This is not always about the money – consideration needs to be given to incentives for teachers. Schools can be very different – this can be a good thing but also challenging for beginning teachers. There is often a disconnect from pre-schooling programs and pedagogy to formal schooling. The Early Years Learning Framework is a good beginning but more needs to be done if we want to see a successful seamless education approach for students.	Constant testing and measuring student performance is unlikely to attract best and brightest preservice teachers. This will not happen while universities enrol pre-service teachers not meeting the minimum course requirements. Beginning teachers are making lifestyle choices and choosing not to work outside the metropolitan area. Systems and sectors all need to implement "right of return" to the metropolitan areas after teachers fulfil the contractual obligations in rural and remote areas. There needs to be more work done collaboratively across Australia to attract teachers/school leaders from overseas and VISA application must be eased to increase the age for VISAs from 45 — 50 when attracting school leaders. Provide incentives and transition programs for teachers and school leaders from overseas to come to Australia and take these positions.	No, we need improve how teachers are perceived by the public. We need to look to other countries to see how they have improved the status of teachers in the community. We need to have a collaborative holistic way to train teachers, not have universities competing for students (funding). We need to narrow our focus when training teachers e.g. ECE and teaching students to read. We need equity due to diversity of our state; there should be more specialised student intervention / assistance programs to help our more diverse (EALD) and indigenous students to develop the skills and knowledge required to teach. There needs to be incentives for teachers to work in rural and remote regions e.g. increase superannuation.
	through the tracking component of the TTN, to make judgements		The TRBWA registration process	

needs to be reviewed as

sometimes the processes are

driven by bureaucracy.

about the teaching and learning in

the classroom. Many teachers are

leaving of the profession because

of the demands of parents.

National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?
Strengthen the initial teacher education accreditation system	No, there is no evidence that the NPIs have been achieved. We are not aware of any quality assurance processes being implemented for teacher training courses in WA and across Australia. There should be a rigorous identification system for students entering teacher training courses. Initial systems need to include screening and interviews of teachers to ensure quality. Strong standards should be maintained where students have already demonstrated Literacy and Numeracy requirements. Funding models encourage universities to take students without the required qualifications for teacher training courses, this must change. We need to have universities collaborating (e.g. federation of universities) in training teachers, not have universities competing for students due to funding needs. Education systems are unaware of tertiary processes with teacher training processes and courses. More collaboration / partnerships need to occur between schools and universities.	There are disconnected teacher training programs across the country which will lead to greater inconsistencies in schools. Differing teacher registration processes across the country also contribute to disconnected schools / systems. It is important that pre-service teachers spend time in schools honing their craft. While online courses are necessary, are these students spending enough time in schools? Removing Commonwealth funding for teaching courses has widened the gap and further diminished attraction to the profession. There needs to be a system where public schools can attract / sign-up pre-service teachers prior to graduation just as non-government schools can. Consideration for schools to put in place a mentoring / monitoring / bursar system where students are identified in secondary schools and supported through teacher training	There are low graduation numbers of students training to become specialist teachers e.g. Education Support. There needs to be incentives for teachers to work in rural and remote regions e.g. increase superannuation. More specialised course content needs to be included to address disability levels, alternative year level curriculum, multi-aged classrooms, etc	No, not for regional students nor those with a disability, as well as EALD and Indigenous students. We don't have the numbers / funding to attract qualified staff.

achieved expected short or medium realising the benefits of the NPIs effective for all student cohorts, out in the NSRA	ole, are the reforms set A likely to improve
Implement a national We can track students now using a There is no clear view of what the	nes in the future?
Implement a national We can track students now using a There is no clear view of what the	
unique student identifier (USI) to support better understanding of student another layer of bureaucracy with no clearly defined purpose. The systems we have in place now are aligned to the WA curriculum and relevant to us. We do not need another system that would be unrelated to our curriculum. There are concerns about the security of the data. Who will amain the security of the data? Who will have access to it? How will be used? There are concerns about the security of the data? Who will have access to it? How will be used? There is a lot of unease about the privacy of the data. Schools, systems and sectors, and the government will have access to the data, and could use and share the information unethically. A common agreement and strong protocols would need to be in place. All states and territories have adapted the AC to meet the needs of their context. The data would not be consistent nor comparable, and therefore unreliable to use. The need for each state and territory to adapt processes to meet their unique contexts, suggests the implementation of the USI to monitor student progress is not feasible. It requires a collaborative approach not a competitive one. There is a view that this data (student progression) will replace NAPLAN. If so, then the data will be subjective and not reliable, therefore invalid. It would also be subject to abuse by the teacher, school, system, and government.	

National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?
		<u></u>		
Establish an independent national evidence institute (NEI) to inform teacher practice, system improvement and policy development	WA already has many strong processes and policies to inform system improvement. These systems / policies cater for the needs of the students and schools in our state. We do not need another system that would be unrelated to our curriculum.	Each state or territory, and jurisdiction needs to cater for their local contexts. This NPI suggests that the NEI will be involved in policy development / teacher practice, etc,. Aren't many elements of these domains local issues, not national ones?	It is not clear what evidence will be used so it is very difficult to identify cohorts at risk when this information is not readily available.	Best pedagogy makes the difference not assessment tasks.
		There is no clarity on how the research will be used. There is concern that the research will not just inform change in schools but will ultimately drive policy at a national level.		
		There is no clear view of which data would be collected and stored in the NEI, nor what the data is used for, and who controls it. This is a major concern.		
		It has been stated that private vendors would play a major part in the development and management of the NEI. It is imperative that they maintain the security and privacy of the data, and not use / sell the data for profit. There is a danger that this data will be breached / misused.		
		There is a danger that private vendors could use the data inform policy to benefit themselves.		
		Given curriculum adaptations across Australia, the evidence collected nationally will not valid.		

INFORMATION REQUEST 3: ASSESSING THE EFFECTIVENESS OF THE NATIONAL POLICY INITIATIVES					
National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?	
		The use of the data tracking student achievement and progress is not clear and is very concerning. Will it be used in place of NAPLAN, or will other standardised tests be used to measure schools and systems? If so, will results be published, rewarded? How will the			
		data be used? There is the possibility that this data would be mis-used leading to even more teacher shortages. The USI aligned to student data would identify the teacher. Will this information be used to reward a teacher or used in evidence as part of a poor performance review?			
		There is a concern that teachers may be pressured to alter their judgements by parents who have high expectations or who have paid for high school fees.			
		Making judgements on the elements that underpin the curriculum is problematical for teachers, and very it is difficult to achieve consistency of judgments.			

National Policy Initiative	Is there evidence that the NPIs have achieved expected short or medium term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?	Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?	Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?	Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?
Improve national data quality, consistency and collection to improve the national evidence base and inform policy development		See above Students will have access to the TTN and will be able to complete self-assessments that would be added to the data collection. How secure and valid is this process? There are major implications for teacher / school workloads. We see now what it means to test Years 3, 5, 7 and 9 during NAPLAN. Ensuring students are up to date with assessments and uploading data on a regular basis will take extra organisation and time, and take time away from quality teaching.	disabilities may have access issues. There is a danger that small schools and cohorts will not fare favourably if the data base determines policy directions based	It has been suggested that fortnightly tests may become part of this tracking system through the TTN. This will increase teaching to the test and how to take a test. Therefore, what is the use of this data? We should be focusing on quality teaching.