**Appendix 3: 2025 Bilateral agreement between SOUTH AUSTRALIA and the Commonwealth on schools reform**

**Preliminaries**

1. South Australia and the Commonwealth of Australia (the Commonwealth) acknowledge the Traditional Owners of the lands and waters on which Australians live, learn and work, and pay respects to their Elders past and present.
2. This Agreement satisfies the conditions in paragraph 22(2)(b) of the *Australian Education Act 2013* (the Act) requiring each state and territory to be party to an agreement with the Commonwealth relating to the implementation of school education reform.
3. Aboriginal and Torres Strait Islander cultures and knowledges are fundamental to shaping and improving education systems and outcomes for South Australia’s Aboriginal and Torres Strait Islander students. South Australia and the Commonwealth commit to ensuring that the implementation of this Bilateral Agreement takes into account of and is consistent with the intent of the priority reform areas outlined in *the National Agreement on Closing the Gap* (Closing the Gap Agreement).
4. South Australia and the Commonwealth acknowledge that Australia has a strong education system, but it can be improved and more equitable for some students. To do that, governments and school systems, in partnership with families, will continue to support every student to succeed so that no one is held back or left behind.
5. South Australia and the Commonwealth reaffirm their commitment to the vision for Australian schooling outlined in the *Alice Springs (Mparntwe) Education Declaration* (the Mparntwe Education Declaration) for a world class education system that encourages and supports every student to be the very best they can be, no matter where they live or what kind of learning challenges they may face.
6. The Interim School Funding Agreement 2025 (*Heads of Agreement)* sets out the shared intention of the Parties to work in partnership to improve education outcomes for all Australian students and build on the capability and capacity of the education workforce. This Bilateral Agreement outlines the actions and activities that South Australia will undertake to achieve these shared objectives.
7. This Bilateral Agreement between South Australia and the Commonwealth will commence on 1 January 2025 and expire on 31 December 2025 unless otherwise agreed.
8. Under section 22 of the Act, a bilateral agreement must be in place. Following expiry of this Bilateral Agreement, a new bilateral agreement will commence from 1 January 2026, by agreement by both parties.
9. The terms of this Bilateral Agreement do not limit South Australia’s and the Commonwealth’s ability to agree different terms as part of a future bilateral agreement. Any variations to this Bilateral Agreement will be in accordance with clause 28 of the Heads of Agreement.
10. For the avoidance of doubt, clauses 7 to 9 of this Bilateral Agreement do not limit either Party to pursue variations to, or withdrawal from, either this Bilateral Agreement or the Heads of Agreement in accordance with clauses 25 to 31 of the Heads of Agreement.
11. Should the Commonwealth provide more favourable funding terms to another state or territory as part of the *Interim School Funding Agreement 2025* or an associated Bilateral Agreement, then the Commonwealth will offer South Australia those terms as well and, if agreed by South Australia, this Bilateral Agreement will be updated accordingly.
12. Clause 11 above also includes but is not limited to:
	1. an adjustment to the measurement of state funding contribution included in another jurisdiction’s Bilateral Agreement as part of the *Interim School Funding Agreement 2025.*
	2. any agreement the Commonwealth makes with any other state or territory as part of the *Interim School Funding Agreement 2025* which favourably impacts on that state’s financial contributions or risk sharing arrangements under the agreement.
13. In either of these cases these terms will also be made available to South Australia, and this Bilateral Agreement will be updated to take into account the adjustment or material change to circumstance.
14. This Bilateral Agreement may also be updated through written agreement of the Commonwealth Education Minister and the South Australian Education Minister if there is a material change in the State’s circumstances, beyond its reasonable control, which will affect South Australia’s fiscal position or the recognition of the State’s funding contribution, in accordance with the process in clause 28 in the Heads of Agreement.

**State Reform context**

1. This Bilateral Agreement sets out the continued activities to be undertaken during its term to give effect to existing national priorities and reforms outlined in the Heads of Agreement.
2. Schools across three sectors in South Australia – government, Catholic and independent – are committed to supporting young South Australians of all backgrounds achieve their full educational potential.
3. Under the Department for Education’s Strategy for Public Education in South Australia (the Strategy), educators and staff work in partnership with families and communities to nurture, develop and empower our young people with the knowledge, skills and capabilities they need to become fulfilled individuals, active, compassionate citizens and lifelong learners.
4. Guided by the Strategy, South Australia strives for excellence and seeks to eliminate barriers to opportunities so that learners from all social, cultural, community and family backgrounds, and of all identities and all abilities are able to access and fully participate in learning experiences.

1. South Australia is committed to delivering an education system where Aboriginal children and young people build on their cultural identity and pride, and develop the knowledge, skills, confidence and resilience needed to achieve their goals and thrive in society. South Australia’s Aboriginal Education Strategy 2019 to 2029 was co-designed in partnership with the South Australian Aboriginal Education and Training Consultative Council and focuses on empowering Aboriginal students by increasing opportunities for students to engage with Aboriginal languages, creating learning environments that respond to students’ cultural needs, developing detailed individual learning plans for Aboriginal learners, and supporting Aboriginal young people on pathways to success.
2. Implementation of the South Australian Government’s education commitments under Closing the Gap is through South Australia’s Implementation Plan for the National Agreement on Closing the Gap and the state level Partnership Agreement.
3. The activities listed above are provided for context and are not considered part of this Bilateral Agreement for the purposes of paragraphs 22(2)(b) and (c) of the Act.

**Part 1 — PURPOSE, OBJECTIVES AND OUTCOMES**

1. South Australia and the Commonwealth acknowledge that a high-quality school education is critical to ensuring that South Australia’s students will succeed in an increasingly complex world. Australia’s future stability and economic prosperity is reliant on a high-quality, equitable and inclusive school system.
2. This Bilateral Agreement sets out the reform activities to be undertaken during its term to give effect to national Objectives, Outcomes and Reforms outlined in the Heads of Agreement. As per clause 59 of the 2025 Agreement, the Parties seek to deliver upon the following Objectives:
3. Equity and excellence – schools and education systems are equipped to provide all students with highly effective evidence-based teaching and equitable learning opportunities and support them to maximise their learning.
4. Wellbeing for learning and engagement – schools take a structured approach to wellbeing for learning in a way which reflects their school and learning environment, and students have a sense of belonging, safety and engagement with their learning.
5. A strong and sustainable workforce – the workforce is respected and continues to grow, and teachers and non-teaching school staff are supported to innovate and be at their best to ensure young Australians thrive in their education. A sustainable workforce means that the Australian community recognises the value teachers and school leaders bring to students, communities and the economy.
6. This Bilateral Agreement also reiterates South Australia’s and the Commonwealth’s ambition and commitment to work together to contribute, along with other states and territories, to the national achievement of the national Objectives and Outcomes specified in the Heads of Agreement. While South Australia and the Commonwealth are committed to this, Commonwealth funding to states and territories under the Act, this Bilateral Agreement or Heads of Agreement is not conditional on the achievement of the Objectives and Outcomes in the Heads of Agreement or this Bilateral Agreement.

**Part 2 — FUNDING**

**Required funding contributions**

1. Under section 22A of the Act, South Australia must meet its funding contributions for the government and non-government sectors as a condition of receiving Commonwealth funding.
2. South Australia’s funding contributions for the government and non-government sectors for 2025 must be in accordance with section 22A of the Act and the Regulations and will determine the default requirement if this Bilateral Agreement is terminated by either party.
3. South Australia’s funding contributions for the government and non-government sectors agreed in this Bilateral Agreement are outlined in Table 1 below for 2025. The minimum funding contributions are expressed as a percentage of the Schooling Resource Standard (SRS) as defined in Part 3 of the Act, and take into account clause 33 of this Bilateral Agreement.

*Table 1. South Australia’s agreed minimum funding shares for the government and non-government sectors, 2025*

| **Sector** | **2025** |
| --- | --- |
| Government | 75% |
| Non-government | 19.72% |

1. The funding contributions outlined above have been agreed having regard to clause 33 of this Bilateral Agreement and based on the following rationale:
2. South Australia will meet the minimum funding requirements as laid out in section 22A of the Act and this Bilateral Agreement.
3. South Australia’s funding share for non-government schools will continue to be at least 19.72 per cent of the SRS.
4. While minimum required shares are outlined at Table 1, South Australia intends to maintain funding of 22 per cent to the non-government sector for the period 2025.
5. The Commonwealth’s share of the SRS for South Australia’s government schools for 2025 is 20 per cent, as set out in the legislation.
6. Consistent with clause 39 of the Heads of Agreement and in the event of a change to the SRS that results in an impact on state contribution requirements, Ministers will agree to amend the contribution shares set out in clause 27 above, to ensure that the state contribution amount is not impacted. The amended amount should represent the funding calculated as if the SRS settings are applied that were in operation at the time the agreement commenced. The Commonwealth will facilitate this process by providing the data required to enable South Australia to calculate the amount of its contribution on an unchanged basis.

**Measurement of contributions**

1. For the purpose of this Schedule, South Australia and the Commonwealth have agreed the costs that are measured towards South Australia’s funding contribution requirements for the government and non-government sectors. In assessing compliance with section 22A of the Act, the National School Resourcing Board's (the Board’s) Terms of Reference will direct the Board to use this agreed methodology for measurement of South Australia’s contribution, including as set out in clauses 33 and 58 of this Bilateral Agreement
2. Consistent with the calculation of the SRS, South Australia’s funding contributions will be measured consistent with the existing Australian Curriculum, Assessment and Reporting Authority (ACARA) financial data reporting methodology for state Net Recurrent Income Per Student (NRIPS) for school years Year 1 minus 1 to Year 12, excluding funding for full fee-paying overseas students, along with the following additional funding types:
	1. Up to 4 per cent of the total SRS for the government sector each year for costs contributing to the provision of education in schools, which may only include, at the State’s full discretion, direct school transport costs and depreciation on assets.
	2. All regulatory funding provided by the government for the purpose of:
		1. SACE Board of South Australia
		2. Education Standards Board.
	3. All funding for the purpose of the National Reforms and National Enabling Initiatives outlined in Part 3 of this Bilateral Agreement or Part 4 of the Heads of Agreement (with the exception of any capital investment funding).
	4. Any accounting standard changes as agreed between the Commonwealth and state and territory Ministers for Education, that affect the measurement of recurrent funding where the NRIPS methodology has not been adjusted to negate this impact (e.g. AASB 16).
3. If the reported contribution for South Australia for 2025 falls short of meeting the required contribution for a sector by an immaterial amount, this will not be considered non-compliant with section 22A of the Act. An immaterial amount is less than or equal to 0.6 per cent of the total SRS for the sector, or another immaterial amount agreed by the Commonwealth Minister for Education for a year, which accounts for the timing constraint of state budget processes being finalised in advance of the year and the required contribution for the year being finalised at the end of the year following the annual School Census.
4. In assessing compliance with this Agreement, the Board will take into account mitigating factors that have contributed to non-compliance. This may include, but is not limited to, fluctuations from year-to-year in funding which could be assessed through, for example, the application of a three year rolling average if funding has fallen below the required amount, unintended and unforeseeable budget pressures in the state budget process, financial accounting impacts (e.g. actuarial assessments and timing of expenditures due to reporting dates), and other unforeseeable circumstances (e.g. such as natural disasters).

**Part 3 — NATIONAL REFORMS**

1. The National Reform Direction activities agreed in this Bilateral Agreement align with the National Reform Directions of the Heads of Agreement and South Australia commits to supporting initiatives aligned to the National Reform Directions.
2. Approved authorities of non-government schools in South Australia must adhere to their ongoing policy requirements under subsections 77(2) and (2A) of the Act). As per clauses 50 and 51 of the Heads of Agreement, approved authorities of non-government schools in South Australia are required to cooperate with the South Australian Government in the implementation of this Bilateral Agreement.

**National Reform Directions**

1. South Australia commits to the actions outlined below to give effect to the National Reform Directions as outlined in the Heads of Agreement.

Equity and Excellence

1. Initiatives that identify student learning needs early and provide tiered and targeted, intensive supports, in line with evidence-based teaching and a ‘multi-tiered systems of support’ approach.
	1. All sectors continuing to:
2. Conduct regular assessment programs, including but not limited to literacy and numeracy assessments, to support teachers in monitoring the progress of students’ development and identifying learning needs.

Wellbeing for learning and engagement

1. Initiatives which support student engagement in learning, for example through greater student participation, attendance, inclusion and/or enhanced school-family engagement.

* 1. All sectors continuing to:
		1. Provide student-centred and evidence informed services and advice to support all students to access their right to an education. This includes supporting schools with universal, targeted and intensive supports to manage complex barriers to school attendance, via programs that consider inclusive teaching and learning practices.

A strong and sustainable workforce

1. Implementing initiatives which support the attraction and retention of the teacher workforce, for example, actions under the *National Teacher Workforce Action Plan* and/or recommendations of the *Strong Beginnings: Report of the Teacher Education Expert Panel*.
2. All sectors continuing to:
	* 1. Deliver initiatives that attract, develop and support effective teaching and empowered leadership, for example through lead teacher initiatives and professional development opportunities. Teachers will be supported and empowered to innovate and be at their best to ensure our learners thrive.
3. Implementation of the National Reform Directions stated above is outlined further in Table 2.
4. Reporting on the activities undertaken in respect of the above National Reform Directions will be undertaken through an Annual Implementation Report, as outlined in Part 4.

**National Enabling Initiatives**

1. South Australia commits to the following actions to give effect to the National Enabling Initiatives as outlined in the Heads of Agreement, and fulfil commitments as per Schedules B and C of the Heads of Agreement:
	1. Contribute to the implementation of the Unique Student Identifier (USI) for South Australian school students.
	2. Contribute to collective work to inform a Review of the Measurement Framework for Schooling in Australia to ensure it remains a relevant tool. This may include student level outcome data, appropriate disaggregated data, and information to inform possible new and updated measures. The review’s Terms of Reference are to be agreed by Education Ministers Meeting and will include consideration of the costs and benefits of:
		1. a new measure of student engagement.
		2. a new equity in learning gain measure, to enable measurement of student learning growth.
		3. national measures of access, participation and outcomes for students with disability to establish a better understanding of the education experiences and outcomes of students with disability.
	3. Supporting development of an early years numeracy check to support teachers to assess their students’ numeracy skills and identify and respond to students who need tailored support.
2. As per clause 72 of the Heads of Agreement, South Australia will contribute to the development of a Project Plan for each of the National Enabling Initiatives in Schedule B of the Heads Agreement.
3. The provision of any information by South Australia as part of its contribution to the delivery of the National Enabling Initiatives will be consistent with the Project Plans to be agreed by Education Ministers Meeting (EMM), the Reporting Requirements in Part 5 of the Heads of Agreement and clause 81 of the Heads of Agreement, which stipulates that as far as practical, reporting requirements will leverage existing reporting processes and data sources and, unless explicitly stated otherwise, will not impose any additional burden on schools.
4. South Australia will not be penalised in any way for failing to achieve milestone deadlines in relation to the National Enabling Initiatives in the Heads of Agreement or this Bilateral Agreement if such non-achievement was due to delayed or non-achievement of other milestones or dependencies outside of South Australia’s control.
5. As set out in clause 75 of the Heads of Agreement, the cost of National Enabling Initiatives will be met by Parties according to the cost sharing principles outlined in Schedule C to the Heads of Agreement, unless otherwise agreed by Education Ministers. For joint projects, EMM typically utilises a population-based funding formula to determine jurisdictional funding propositions. For the avoidance of doubt, South Australia will not need to contribute more towards jurisdictions’ share of the national cost of a National Enabling Initiative than is proportional to South Australia’s share of the total national school student population, unless otherwise agreed by South Australia’s Minister for Education, Training and Skills.

**Implementation**

1. In committing to the above reforms, South Australia commits to the actions and milestones set out in Table 2.
	1. The South Australian Government undertakes to co-operate with the non-government school sector in South Australia in the implementation of the reforms outlined in this Bilateral Agreement through regular cross-sector forums comprising education sector heads and senior representatives to discuss key education issues.
2. In accordance with subsection 77 (2A) of the Act, non-government approved authorities are required to cooperate with their local state or territory government in the implementation of this Bilateral Agreement.
3. The non-government sector in South Australia, as per clause 51 in the Heads of Agreement, should cooperate with the South Australian Government to implement the National Reform Directions and National Enabling Initiatives. Activities against National Reform Directions undertaken by the South Australian non-government sector will be included in reports by the non-government representative bodies provided to the Australian Government as set out in Part 5 in the Heads of Agreement.
4. The Commonwealth will not impose financial or other sanctions on South Australia for a failure by South Australia’s non-government school sector to cooperate with this Bilateral Agreement. Nor will the Commonwealth impose sanctions on the non-government school sector for a failure of South Australia to cooperate with them in the implementation of this Bilateral Agreement.

**National Reform Directions Implementation Milestones**

Note: This table should capture all reform efforts outlined in Part 3.

*Table 2 – South Australia bilateral school reform milestones*

|  |  |  |
| --- | --- | --- |
| **Reform and Milestones** | **Sector** | **Timing** |
| **Reform A – Equity and Excellence** |
| **Initiatives that identify student learning needs early and provide tiered and targeted, intensive supports, in line with a ‘multi-tiered systems of support’ (MTSS) approach.**  |
| * Conduct regular assessment programs, including but not limited to literacy and numeracy assessments, to support teachers in monitoring the progress of students’ development and identifying learning needs.
 | All sectors | 2025 |
| **Reform B – Wellbeing for Learning and Engagement**  |
| **Initiatives which support student engagement in learning, for example greater student participation, attendance, inclusion and/or enhanced school-family engagement.** |
| * Provide student-centred and evidence informed services and advice to support all students to access their right to an education. This includes supporting schools with universal, targeted and intensive supports to manage complex barriers to school attendance, via programs that consider inclusive teaching and learning practices.
 | All sectors | 2025 |
| **Reform C – A Strong and Sustainable Workforce**  |
| **Initiatives to increase teacher attraction and retention, for example implementing actions under the *National Teacher Workforce Action Plan* and/or recommendations of the Teacher Education Expert Panel report.** |
| * Deliver initiatives that attract, develop and support effective teaching and empowered leadership, for example through lead teacher initiatives and professional development opportunities. Teachers will be supported and empowered to innovate and be at their best to ensure our learners thrive.
 | All sectors | 2025 |

**Part 4 — REporting REquirements**

**Requirements for annual reporting to the Commonwealth**

1. The following clauses set out the annual reporting arrangements for South Australia for 2025.
2. As set out in Part 5, clause 83 of the Heads of Agreement, South Australia will ensure full and accessible information on their needs-based funding arrangements are publicly available, in line with subsection 78(5) of the Act.

**Annual Funding Report**

1. The Commonwealth will provide South Australia with a Funding Estimation Tool in January 2026 prior to South Australia’s annual report with the final SRS data for 2025 for the purpose of the Board’s review of South Australia’s compliance with section 22(A) of the Act.
2. As outlined in Part 5, clause 84e of the Heads of Agreement, the South Australian minister responsible for school education, or their delegate (i.e. the Director General (or equivalent) of the Department responsible for school education) must provide an Annual Funding Report to the Commonwealth Education Minister, or their delegate such as the Departmental Secretary on state funding for government and non-government schools for the purposes of assessing compliance with section 22A of the Act, as set out in the Bilateral Agreement.
3. South Australia must provide its Annual Funding Report for 2025 to the Commonwealth no later than 30 November 2026.
4. The Annual Funding Report must set out the following:
	1. The total amount of funding provided by South Australia for government schools in South Australia for 2025 as measured in line with clause 33 of this Bilateral Agreement.
	2. The total amount of funding provided by South Australia for non-government schools in South Australia for 2025 as measured in line with clause 33 of this Bilateral Agreement.
	3. Total full time equivalent enrolments for 2025, relating to the amounts in (a) and (b) above.
	4. The amount for each funding type set out in clause 33 of this Bilateral Agreement.
	5. The amount of funding consistent with the specified NRIPS methodology.
5. For the avoidance of doubt, each amount included in the Annual Funding Report must have been:
	1. spent by the South Australian Government for schools for 2025 (including centralised funds expended by the department for schools and funds allocated for schools that are not spent within 2025 but are spent within the remainder of the financial year or subsequent years by schools in accordance with their local financial plans), or approved authorities, or
	2. spent by schools or approved authorities for 2025, and
	3. not counted towards another reporting year for the purposes of this Agreement, and
	4. not counted towards another Commonwealth-State agreement, without the explicit consent of the Commonwealth.
6. It should be noted that clause 59 of this Bilateral Agreement does not prevent South Australia also including budgeted amounts in its report.
7. Each amount included in the report for a sector must have been allocated or expended for that sector. Note: this means South Australia cannot count funding provided for one sector towards the contribution requirement for another sector.
8. Each amount included in the report must be net of any Australian Government funding.
9. The Annual Funding Report provides for an optional statement explaining:
	1. any material variances (positive or negative) in the total amount of South Australia’s funding contribution that is between 2025 and 2024 for:
		1. government schools in South Australia and
		2. non-government schools in South Australia
	2. any adjustments to South Australia’s funding contribution (i.e. timing adjustments) outside of the specified NRIPS methodology.
10. For each amount, the report must include evidence that the amount has been certified and is consistent with the agreed methodology in clause 33 of this Bilateral Agreement by one of the following:
	1. the Auditor-General of South Australia or
	2. an independent qualified accountant or
	3. an independent qualified accountant engaged by ACARA for NRIPS funding or
	4. the Director General or equivalent of the education portfolio for the state or territory, but only up to 0.1 per cent of the SRS for South Australia for all reported funding.
11. The Annual Funding Report may also provide an explanation and supporting evidence for the Board’s consideration of any material shortfall between the total amount reported for 2025 and the agreed funding contributions for 2025 in clause 27 of this Bilateral Agreement.
12. The Commonwealth will provide South Australia’s Annual Funding Report to the Board for assessment of South Australia’s compliance for 2025 with section 22A of the Act, including any funding requirements specified in this Bilateral Agreement.
13. The Commonwealth may request additional information from South Australia on behalf of the Board, to be provided within 21 days. If South Australia does not provide information or advice in this timeframe, the Board will make an assessment based on the information and evidence available. Such requests will be consistent with clause 81 of the Heads of Agreement which stipulates that as far as practical, reporting requirements will leverage existing reporting processes and data sources and unless explicitly stated otherwise, will not impose any additional burden on schools.
14. South Australia will have an opportunity to provide further information for the Board’s consideration following their receipt of the Board’s draft findings.

**Annual Implementation Report**

1. As outlined in Part 5, clause 84(a) of the Heads of Agreement, the Director General or equivalent of the education portfolio for South Australia must provide an Annual Implementation Report, as the approved system authority for government schools, on progress on existing reform activities against the National Reform Directions, as outlined in this Bilateral Agreement and as part of assessing compliance with paragraph 22(2)(c) of the Act.
2. The template for the Annual Implementation Report is found at Attachment A of this Bilateral Agreement.
3. The Annual Implementation Report for 2025 is required by 30 November 2026, or a date as agreed by the Commonwealth and South Australia.
4. The Annual Implementation Report must include:
	1. progress towards agreed reform activity as outlined in Table 2 of this Bilateral Agreement for the National Reform Directions.
	2. where applicable, information on how the implementation of each of the National Reform Directions has been targeted to priority equity cohorts (as defined in the Heads of Agreement) and, where relevant, to schools which need additional support.
5. For the avoidance of doubt, South Australia’s Annual Implementation Report should focus on government school implementation, noting that as per clause 87 in the Heads of Agreement, non-government representative bodies will be required to provide an Annual Implementation Report for 2025 to the Commonwealth by 30 November 2026.

**SIGNATURES**

|  |  |  |
| --- | --- | --- |
| **Signed** *for and on behalf of the Commonwealth of Australia by* |  | **Signed** *for and on behalf of* *South Australia by* |

**Attachment A: Annual Implementation Report template**

**Purpose of this reporting template**

This Annual Implementation Report reporting template contributes to achieving the transparency and accountability commitments under the *Interim School Funding Agreement 2025*. South Australia will fill in the Annual Implementation Report and report it to the Australian Government Department of Education in relation to the government school sector; non-government representative bodies will also be required to fill in their own template (see Schedule E of the Heads of Agreement).

As per Clause 81 of the Heads of Agreement, reporting requirements under this Agreement will leverage existing reporting processes and data sources.

**National Reform Directions**

South Australia is required to fill in the below table outlining their implementation of National Reform Directions in relation to the government school sector.

|  |  |  |  |
| --- | --- | --- | --- |
| **National Reform Directions** | **Description of local implementation**  | **Outline the focus on priority equity cohorts and schools needing additional support (where applicable)** | **Details of qualitative or quantitative impact where applicable** |
| [For example] Structured initiatives that support wellbeing for learning and engagement, for example in-school wellbeing coordinators or access to School Counsellors, psychologists, mental health workers and/or youth health nurses. |  |  | Where applicable, for example, ratio of wellbeing functions to students, where applicable. |
| [National Reform Direction] |  |  |  |