



AISSA Response to the Better and Fairer Education System Consultation Paper

Executive Summary

The Association of Independent Schools of South Australia (AISSA) represents the interests of 103 South Australian Independent schools located across metropolitan, regional and remote areas. Independent schools in South Australia enrol over 52,700 students from a wide range of socio-economic, cultural and family backgrounds. The sector includes two special schools which educate students with severe disabilities, three special assistance schools which educate students who have experienced significant disengagement with school and one Majority Torres Strait Islander School.

It is essential that the next National School Reform Agreement (NSRA) remains a high-level Agreement between the Commonwealth and the State and Territory governments with any targets associated with the NSRA outlined in the Bilateral Agreements and a relevant document such as the ACARA Measurement Framework. The NSRA should be underpinned by the premise that wellbeing, both staff and student, is at the heart of improving education outcomes and further acknowledge that enhancing education outcomes for all students, including those experiencing educational disadvantage, will always be ongoing. The focus of the reform directions under the current Agreement – supporting students, student learning and achievement; teaching, school leadership and school improvement; and enhancing the national evidence base – should continue to be core areas for reform.

All students, regardless of school sector have an entitlement to education. A key barrier to improving education outcomes for Australian students remains the highly political nature of education policy which is frequently underpinned by outdated or inaccurate assumptions regarding the three schooling sectors, particularly with regard to the diversity within each of the sectors. All three school sectors are educating students who experience educational disadvantage including students from priority equity cohorts. In the South Australian Independent school sector, for example, 70% of schools with a capacity to contribute have a DMI¹ value less than 100 with 39% having a value less than 93. Over 23% of students have a disability, 22% of students are from a language background other than English and 1092 students are from an Aboriginal and Torres Strait Islander background.

While all governments have a role in setting overarching policy frameworks, it is essential that such frameworks remain at a high-level, acknowledge jurisdictional responsibilities, and do not compromise contemporary evidence-based practice across core school operations.

The AISSA has significant concern with what appears to be an overwhelming focus by the Panel on identifying targets to measure the outcomes of schooling which suggests a deficit approach to enhancing educational outcomes. The AISSA acknowledges the necessity for overarching targets and, the attractiveness of the concept that increased measurement will automatically lead to improvement. However, the proposals as outlined in the Consultation Paper, if adopted, will impose an unreasonable compliance burden on schools, increase teacher workload, divert resources away from teaching and learning, result in an overly burdensome data-driven approach to education. Importantly, increased simplistic measurement will not provide the level of meaningful information to drive education improvement.

Any targets and subsequent measures that flow from the NSRA should be evidenced based, having regard to the wide-ranging body of evidence, and developed in consultation with key stakeholders who have the requisite contemporary knowledge of schooling and education best practice to ensure that they are fit for purpose. The non-government school sectors are key providers of early childhood and school education in Australia and must be included in this consultation.

¹ The Direct Measure of Income (DMI) is a measure of the socio-economic status of a school community.

The AISSA acknowledges the current opinion that the current National Measurement Framework has not been fully adequate for measuring the outcomes of the current NSRA. However, the work to address educational disadvantage is highly complex and ongoing. It is essential that prior to any introduction of new measures a comprehensive evaluation is undertaken of the data which is currently collected.

Government funding arrangements which enable schools to implement programs and strategies which are context specific, student centred, and targeted to need are essential. All school sectors require ongoing professional support to assist them in implementing reform priorities. In the non-government school sector, the Non-Government Reform Support Fund (NGRSF), has provided critical funding which has enabled representative bodies, such as the AISSA, to offer at scale specialist services and professional learning; these enable schools to build capacity and to implement innovative, evidence-based, student-centred inclusive approaches to student learning in an efficient and effective manner. Specific program funding is further key in enabling connection at scale between schools supporting students in priority equity groups and those with local knowledge. A requirement of the NGRSF, and previous programs, has been the annual reporting on all funded activity. This fund ceases at the end of 2023. It is essential that further program support funding for non-government schools forms part of the next NSRA. This work has been enhanced by the strong cross-sector collaboration that occurs between the three school sectors in South Australia.

Recommendations

Non-government schools play an essential role in the Australian school education eco-system. There is no capacity for all Australian students to be educated in government schools. Funding models that promote outdated or inaccurate assumptions regarding the three schooling sectors, particularly with regard to ignoring the diversity and need within each of the sectors, should be avoided. The needs of non-government school students, particularly those experiencing educational disadvantage, and their families, should not be disadvantaged because of choice of school.

Targets and Measures

- The AISSA would support the proposition in the Consultation Paper that existing data be leveraged to define appropriate measures of success. The AISSA supports the critical importance of achievement for priority equity cohorts; however, the suggestion to include additional indicators, particularly indicators that focus on students in equity cohorts who start behind and those who fall behind, runs the risk of trying to oversimplify complex problems through the use of a measurement approach.
- The benefit of higher-level targets is the resulting capability of each system, sector and school to respond appropriately within a specific contextual frame. Equally, any measures to address barriers for the identified priority cohorts must be cross-sectoral so that there is parity and equal access to reforms, initiatives and funding for these students.
- Any measures proposed for the NSRA should recognise their place within the broader framework for educational reform and additional measures that go beyond academic performance are unnecessary. The development of targets to measure the outcomes of schooling in relation to the next NSRA, as proposed by the Consultation Paper, will impose an unreasonable burden on schools, increase teacher workload and result in an overly burdensome data-driven approach to education.

Supporting schools to improve outcomes

- Educational disadvantage is often the result of a range of complex inter-related factors which can include factors beyond the control of schools. Decisions about approaches required for different at-risk cohorts are best placed with the system and school.
- The use of evidence-based practice is essential in progressing education reform and the responsibility to make appropriate contextual choices should rest with those close to the context. It is not appropriate that any external organisation from within the education arena holds the responsibility of determining a preferred, or a suggested 'best', evidence base.
- Across Australia, education systems, sectors and schools have always, and will continue to, self-reflect and commit to the complex task of addressing educational disadvantage and furthering educational opportunities, with a continuous improvement mindset.

- Previous Reform Support Funding has enabled the AISSA to work with efficiency and at scale at the school level to enable the implementation of evidence-based practices in Independent schools. In support of improving student outcomes, this work has focused on helping teachers gain new insights, pursue new goal-directed behaviour, acquire new skills and embed changes in their practice.
- Continuation of support through funded programs such as the NGRSF is essential to enable all schools to build ongoing capacity to enhance outcomes for all students and to address educational disadvantage.
- Transparency and accountability for use of government funds is already achieved through a multitude of reporting mechanisms. The AISSA, as a NGRB, provides an efficient and effective reporting avenue and it is firmly believed that the measurement of student outcomes in the NSRA should not add to workload requirements at the school level.

Improving student mental health and wellbeing

- Improving student mental health and wellbeing is best approached through a whole of school targeted strategy comprising prevention, protection and promotion, through providing evidence-based resources to build school leadership and staff capacity. The AISSA Wellbeing Toolkit provides an excellent example of how the evidence base can be navigated to drive implementation and sustainability at the school level.
- The AISSA does not believe that any wide-scale measurement would have the requisite detail to positively impact student outcomes. The introduction of a wellbeing indicator needs to be of value to those working with these cohorts and therefore, the use of current local data sets is preferred for reporting over the introduction of an additional national measure.
- Partnerships and referrals are not always straightforward and actualising delivery of these services by external providers can be problematic. Schools rely heavily on the AISSA for guidance and access to expert Allied Health professionals, as the AISSA has well established relationships with a range of relevant professionals and brokerage processes to reduce school's administrative burden and expedite the delivery of professional services to students with diverse needs.

Our Current and Future Teachers

- Teacher attraction and retention needs to be viewed within a larger societal context, particularly relevant in the immediate post pandemic years. Although trends in teacher supply have peaked and troughed over various decades, there is a distinct shift from the priorities of a pre-COVID workforce.
- Reforms are needed that inspire teachers to grow in their professionalism, such as sabbaticals, scholarships, across-school learning and being part of teacher professional learning communities, to feel satisfied and excel in their practice and profession.
- The role of sectors and NGRBs to support teacher career pathways, through programs that attend to movement through specific career stages, e.g. graduate to proficient, as well as processes that promote the national teacher certification processes for Highly Accomplished and Lead Teachers, should be promoted.
- Any move to a national registration process must maintain the South Australia Teacher Registration Board as the regulatory authority that has oversight and maintenance of teacher registration. Although the benefits of increased teacher portability in the context of teacher attraction and retention are recognised, this cannot come at the expense of the lowering of current South Australian standards and requirements.

Collecting data to inform decision-making and boost student outcomes

- Data underpinning the measures, targets and indicators that sit under the next NRSA needs careful and broad framing to allow for implementation of systemic and school localised responses.
- There is tension in the desire for neat solutions to demonstrate progress and the reasonableness that a national measure could be progressed through a single data source, that fails to recognise the complex societal construct education sits within. School autonomy and local decision making are vital in enabling individual students to remain at the heart of data-informed school improvement and for schools to identify evidence-based improvement strategies appropriate to their context.

- To try and harness a fulsome repertoire of national data, arising from appropriately rigorous and contextually correct tools used across the nation, would place enormous reporting burden at the school level and would be completely counterproductive given the concerns about teacher and leadership retention described as a key concern of the Panel.
- The proposal for an independent body with responsibility for collecting and holding data runs the risk of undermining systemic and sector integrity and would be a poor choice for the expenditure of public funds.

Funding transparency and accountability

- A best practice approach to educational accountability should recognise the diversity of purposes of school education and the autonomy of Independent schools and systems within the sector.
- Government investment that supports the capability of all schools to maintain autonomy and to be responsive to the needs of their school community, within a framework of high-level accountabilities, is more likely to lead to significant school improvement.
- Accountability should enhance educational standards not standardisation.

Improving student outcomes – including for students most at risk of falling behind

Equity and Excellence

The AISSA is supportive of the aim to place excellence and equity at the core of the recommended NSRA approach to improving student outcomes. This underscores the importance of providing all students with access to high quality education, regardless of their background or socio-economic status or choice of schooling. As a significant proportion of SA Independent schools across both metropolitan and regional areas are from lower socio-economic areas, with 70% of schools with a DMI score of less than 100, the addressing of educational disadvantage is an absolute imperative for the Independent school sector.

Targets and Measures

The intent of targets in the NSRA is to track progress towards national outcomes for school education in Australia, with the previous Agreement indicating that achieving this requires sustained reform effort. The three previous NSRA targets are still important aspects to progress nationally – to be a high quality and high equity schooling system, to lift Year 12 or Certificate III attainment and to halve the gap for Aboriginal and Torres Strait Islander students in Year 12 or equivalent.

The AISSA recognises how critically important it is to support 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. The suggestion to include additional indicators, particularly indicators that focus on students in equity cohorts who start behind and those who fall behind, runs the risk of trying to oversimplify complex problems through the use of a measurement approach. The number of Special Assistance Schools and campuses in the SA Independent sector, which holistically support disengaged and disadvantaged youth, has increased in recent years and these students are just one example of where standardised measurement approaches are likely to fall short.

Correspondingly, the benefit of higher-level targets is the resulting capability of each system, sector and school to respond appropriately within a specific contextual frame. Equally, any measures to address barriers for the identified priority cohorts must be cross-sectoral so that there is parity and equal access to reforms and initiatives for these students.

The AISSA would support the proposition in the Consultation Paper that existing data be leveraged to define appropriate measures of success. The AISSA acknowledges the current opinion that that the current National Measurement Framework has not been fully adequate for measuring the outcomes of the current NSRA; however, the work to address educational disadvantage is highly complex and ongoing. The NSRA is one of eleven inter-related measures and we have significant concern that the development of targets to measure the outcomes of schooling in relation to the next NSRA, as proposed by the Consultation Paper, will impose an unreasonable burden on schools, increase teacher workload and result in an overly burdensome data-driven approach to education.

Importantly, the current Framework indicates that any key measure should be cost effective, practical to collect, and take account of the burden and impact that data collection may place on students, schools and schooling systems. Any measures proposed for the NRSA should recognise their place within this broader framework and therefore, the AISSA would deem that additional measures that go beyond academic performance are unnecessary.

Supporting schools to improve outcomes

The NRSA Interim Report finding, that achievement gaps are evident across the student spectrum and are not confined to equity cohorts, must be recognised. While early identification of students at risk of falling behind is vital, supporting at risk students is more complex than the suggestion of a *swift learning intervention after early identification*.

Authentic identification and working alongside parents and other allied health professionals is sensitive and ongoing work. Educational disadvantage is often the result of a range of complex inter-related factors which can include factors beyond the control of schools. Decisions about approaches required for different at-risk cohorts are best placed with the system and school and it is here that the expert input of specialised AISSA staff has built capacity in and across schools, as well as across SA education sectors. Previous Reform Support Funding has enabled the AISSA to work with efficiency and at scale at the school level to enable the implementation of evidence-based practices in Independent schools. In support of improving student outcomes, this work has focused on helping teachers gain new insights, pursue new goal-directed behaviour, acquire new skills and embed changes in their practice. (Appendix 1)

The use of evidence-based practice is essential in progressing education reform and the responsibility to make appropriate contextual choices should rest with those close to the context. It is not appropriate that any external organisation from within the education arena holds the responsibility of determining a preferred, or a suggested 'best', evidence base.

As networked environments comprising multiple stakeholders and frequently changing school personnel, it is essential to acknowledge that creating long term change for students in priority groups, as well as embedding skills and capacities within schools, requires ongoing sustained support.

The Consultation Paper also proposes that there is room for improvement. It must be remembered that across Australia, education systems, sectors and schools have always, and will continue to, self-reflect and commit to the complex task of addressing educational disadvantage and furthering educational opportunities, with a continuous improvement mindset. Importantly, for Independent schools and NGRBs, transparency and accountability for the use of government funds is already achieved through a multitude of reporting mechanisms. The AISSA, as a NGRB, provides an efficient and effective reporting avenue and it is firmly believed that the measurement of student outcomes in NSRA should not add to workload requirements at the school level.

Improving student mental health and wellbeing

The Panel's emphasis in supporting student mental health and wellbeing, including early intervention, is applauded. It is critical that resourcing is equally available to schools across both government and non-government sectors. The AISSA proposes that this is best approached through a whole of school targeted strategy comprising prevention, protection and promotion, through providing evidence-based resources to build school staff capacity. The relationship between positive student mental health and better academic outcomes has been well documented in research literature. Positive relationships between students and staff is a positive indicator of improved student mental health.

It is essential to acknowledge the contribution of NGRBs, as active organisations who play key roles in assisting schools to navigate and access this evidence base. The development of the AISSA Wellbeing Toolkit, made possible through government program funding, is a timely and important example of this contribution.

In 2022, the Student Mental Health and Wellbeing Taskforce, comprising principals, Professor Donna Cross and AISSA staff was established by the AISSA's Chief Executive. This work led to the development of the AISSA Wellbeing Toolkit, focusing on a universal wellbeing promotion and an early intervention approach. Supporting positive mental health and wellbeing is complex and ongoing. Developing young people's academic social and emotional and behavioural capabilities is highly dependent on skilled, competent and dedicated school staff (Cross, 2023). The AISSA undertook an integral role in the development of the Toolkit and it is only through the provision of government funding that this was achieved.

The Toolkit assists schools to strengthen practice and pedagogy for whole school wellbeing and practice within their own context. It includes evidence-based resources to build staff capability to best support student, staff and leader wellbeing through a whole school lens. The building of leadership capacity to drive implementation and sustainability at the school level was a key priority and the tool provides a structure for action at the individual school level through audit, assessment and review. Complementing this important work, the SA Independent sector wellbeing coordinator network remains an important priority for AISSA and supports school staff to build capacity and remain abreast of the latest evidence and resources so they can apply practical based strategies to deepen understanding and improve outcomes.

The AISSA does not believe that any wide-scale measurement would capture the requisite detail to positively impact student outcomes, particularly given the newness and complexity of this area. Moreover, the AISSA does not support the addition of wellbeing survey questions to existing wide scale student assessments, especially those currently part of the National Assessment Program. A range of tools is currently in place across states and territories that are used to measure wellbeing, including the South Australian Wellbeing and Engagement Collection (WEC). These tools provide valuable information to schools and systems that help shape the development of contextual responses and plans. The introduction of a wellbeing indicator needs to be of value to those working with these cohorts and therefore, the use of current local data sets is preferred for reporting over the introduction of an additional national measure. Whilst we agree that the collection of macro level data may be valued by some, a key consideration is the potential for increased stress for both teachers and students, especially vulnerable cohorts, if an assessment approach is undertaken.

The need for school leaders and teachers to be equipped with the skills and training to support students struggling with mental health is ongoing. The AISSA has always played a key role in the brokerage of high-quality professional learning to build the skills and expertise of school leaders and teachers. Recent examples include deepening teacher knowledge about Youth Mental Health First Aid, as well as learning about best approaches in responding to self-harm in the primary school setting. These occasions offer valuable opportunities for schools to deepen their knowledge and share insights, within and across schools, to develop a robust ecosystem of informed practice.

While the AISSA is supportive of the aim to establish stronger partnerships between schools, Local Health Networks and Primary Health Networks, it must be recognised that many services have limited capacity, with extensive wait times existing for crisis care, psychological services, counselling and more. There is a need for increased community relations with schools, specifically for students experiencing acute mental health episodes and the AISSA is a key conduit for schools in this process, having well developed and active relationship with key local and primary health networks in place. The AISSA model exemplifies best practice in this area.

Partnerships and referrals are not always straightforward and actualising delivery of these services by external providers can be problematic. There are very real concerns in relation to the added burden on teachers and other school staff in expecting schools to triage and respond to concerns in relation to mental health and wellbeing in lieu of professional health services. Schools rely heavily on the AISSA for guidance and access to expert Allied Health professionals, as the AISSA has well established relationships with a range of relevant professionals and established brokerage processes that reduce school's administrative burden and expedite the delivery of professional services to students with diverse needs. This relationship also has the added benefit of a reduced wait time for formalised diagnostic assessments. This could not occur without coordination by the AISSA, but is only made possible through government funding.

Our Current and Future Teachers

It is essential that the Panel recognises the range of cross-sector work that is well underway across the nation to develop relevant local responses to the core issues underpinning attraction and retention of teachers. This work, initiated by Ministers and documented in the National Teacher Workforce Action Plan, needs to be undertaken strategically and in cooperation across sectors, as this is a universal issue for all schools and particularly for those across all sectors in regional and remote areas of Australia.

Teacher attraction and retention needs to be viewed within a larger societal context, particularly relevant in the immediate post pandemic years. Although trends in teacher supply have peaked and troughed over various decades, there is a distinct shift from the priorities of a pre-COVID workforce. Additionally, teaching today is more greatly emphasised as a profession rather than a vocation, bringing with it rigid industrial conditions along with enormous professional and parental expectation.

Whilst activities that reduce potential administrative burdens on teachers are important and should be explored with intentionality, reforms are also needed that inspire teachers to grow in their professionalism, such as sabbaticals, scholarships, across-school learning and being part of teacher professional communities. It is these occasions that inspire and motivate teachers to feel satisfied and excel in their practice and profession. The AISSA, as an NGRB, has played a key role in providing these professional ecosystems of practice for teachers in non-government schools, with the previous Reform Support Funding underpinning the delivery of these services. A range of learning opportunities and projects can be found in Appendix A, including those that build the digital capabilities of staff. The AISSA is also well placed to support schools to re-think how teacher work and the nature of schools might need to change to make it more sustainable for the staff.

The recently revised national processes for teacher certification will continue to provide avenues to reward those who flourish in the classroom. The cross-sector certification processes in South Australia, complete with an annual cross-sector certified teacher recognition ceremony, exemplify this. Coordinated by each sector, funding is critical in maintaining sector processes for the related assessment processes and other key activity such as contributing to national process and towards the annual Highly Accomplished and Lead Teacher Summit. It is these activities that raise both the quality and the status of the profession. In addition, many Independent schools already have the autonomy to introduce additional titles that recognise teacher excellence and expertise, contributing to teacher satisfaction and retention.

A key strength of the AISSA as a NGRB is the ability to connect across national priority areas for the benefit of supporting and raising the profession. The long-established AISSA Early Career and Mentor Teacher program *Navigating the First Years* emphasises practiced-focused mentoring opportunities that support the mentor to flourish and grow as highly accomplished or lead practitioners, in addition to leveraging AITSL induction research in support of the graduate teacher.

Any move to a national registration process must maintain the South Australia Teacher Registration Board as the regulatory authority that has oversight and maintenance of teacher registration. Although the benefits of increased teacher portability in the context of teacher attraction and retention are recognised, this cannot come at the expense of the lowering of current South Australian standards and requirements. This is particularly important in relation to the recognition of teaching qualifications or the requirements for continuing registration, for example, the tracking of applicants with potentially compromised registration in another jurisdiction, evidence of ongoing of professional learning and the SA mandatory notification training - Responding to Risks of Harm, Abuse and Neglect – Education and Care. For all national registration processes, engagement with the Disability Standards for Education e-learning should be mandatory.

Collecting data to inform decision-making and boost student outcomes

Government policy frameworks, including funding arrangements, which enable schools to implement targeted and contextually specific programs and strategies are essential if Australia is to improve education outcomes. The importance of public accountability is noted, as is the role of the annual National Report on Schooling in Australia to provide an account of national progress, of which the NRSA is one of eleven interrelated measures.

Data underpinning the measures, targets and indicators that sit under the next NRSA needs careful and broad framing to allow for implementation of systemic and school localised responses. There is tension in the desire for neat solutions to demonstrate progress and the reasonableness that a national measure could be progressed through a single data source, that fails to recognise the complex societal construct education sits within. School autonomy and local decision making are vital in enabling individual students to remain at the heart of data-informed school improvement and for schools to identify evidence-based improvement strategies appropriate to their context.

Identification by the Productivity Commission and AERO, of the need for longitudinal data to identify the actual students at risk of falling behind based on their performance (and not on equity groups alone) and to monitor these students' progress over time is critical and achievable at *the school or systemic level*. To try and harness a fulsome repertoire of national data, arising from appropriately rigorous and contextually correct tools used across the nation, would place enormous reporting burden at the school level and would be completely counterproductive given the concerns about teacher and leadership retention described as a key concern of the Panel. Additionally, the proposal for an independent body with responsibility for collecting and holding data runs the risk of undermining systemic and sector integrity and would be a poor choice for the expenditure of public funds.

Funding transparency and accountability

The AISSA agrees that transparency and accountability are integral to ensuring public confidence in the use of taxpayer funding. However, we do not accept the inherent assumption in the paper that there is currently a lack of reporting accountability or transparent data available to the government to assess compliance.

It is the AISSA's view that a best practice approach to educational accountability should recognise the diversity of purposes of school education and the autonomy of Independent schools and systems within the sector. Government investment that supports the capability of all schools to maintain autonomy and to be responsive to the needs of their school community, within a framework of high-level accountabilities, is more likely to lead to significant school improvement. Accountability should enhance educational standards not standardisation.

Independent schools are highly accountable and must meet a wide range of legislative, regulatory and reporting conditions to operate and remain registered in Australia. In South Australia, schools are registered under the *Education and Early Childhood Services (Registration and Standards) Act 2011* and must be compliant with the *Standards for registration and review of registration of schools in South Australia*. As incorporated associations, companies limited by guarantee or registered charities, Independent schools are accountable to a range of bodies including, but not limited to, the Australian Securities and Investments Commission, the Australian Taxation Office and the Australian Charities and Not-for-profits Commission. This includes the annual provision and publication of financial data.

Independent schools are significant employers covering both teaching and non-teaching staff and, as such, must comply with legislation and regulations covering issues such as equal employment opportunity, industrial awards and work health and safety. Independent schools must also meet child safety requirements along with other legislative obligations such as health, safety, privacy and as well as regulations relating to building and fire codes.

Receipt of government funding, under both the *Australian Education Act 2013* and in South Australia the State Government funding deed is dependent on being a not-for-profit institution and meeting a range of other conditions governing the use of funding. Schools are required to demonstrate that the funds they receive from government have been expended in line with their legislative obligations and provide relevant financial data, including audited financial statements, to the Australian Government Department of Education and, in South Australia, the State Government Department for Education. The Australian Government also undertakes each year a verification process with regard to the provided financial data.

Obligations under the *Australian Education Act 2013* include participation in national testing; implementation of the national curriculum; the provision of data on schools, staff and students for national reporting; and completion of an annual financial questionnaire, financial viability assessment and reporting against government grants. Approved Authorities for more than one school are required to distribute funding according to a needs-based formula, approved by the Australian Government, with details regarding the distribution published on system authority websites.

A wide range of the data provided by Independent schools to the Australian Government is publicly reported on the ACARA MySchool website including financial data, student data, student attendance and NAPLAN results. In addition, schools are required to report funding and other information as part of their school performance reporting requirements under the *Australian Education Act 2013*, and this information is published on individual publicly available school websites.

The AISSA acknowledges that the complexity of the current funding model creates potential difficulties for school community members in understanding how funding is used to support students in the school, including students from priority groups and that there is a view amongst some that publishing detailed information on how government funding is used would enable greater oversight as to how funding is used. As the consultation paper notes, the current funding framework provides flexibility to use funding to spend funding in response to local needs and individual school contexts, which enables schools to be responsive to student need. The vast majority of funding, both government and other sources, is used to support student learning through staffing and educational programs. The complexity and inter-connectedness of education programs and school operations means that it would be impossible to provide granular information which was meaningful and gave a true representation of the support that schools provide. Not only would any such requirement add a significant additional accountability burden on schools, but it further has the potential to compromise the privacy of individual students.

Appendix A – AISSA Independent School Programs and Initiatives Funded through Government Programs

Building Teacher Excellence	Australian Curriculum v9.0 Familiarisation and Implementation
	Brightpath: Next Steps
	Deep Learning and Teaching - Pathways for Sustained Improvement 2023-2024
	Discovering AI: Creating Curious Classrooms Action Research Project
	Instructional Coaching Series
	Leaders New to VET Workshops
	Leading Change in the Teaching of Literacy
	Leading Change in the Teaching of Primary Mathematics
	National Teacher Certification
	Navigating the First Years - Early Career Mentor Teacher Program
	New Thinking New Possibilities STEM 2023 Webinar Series and Conference
	Science of Understanding Learning: Learning Blueprint - New and Continuing Teams
	Transforming Classroom Practice: The Cross-Curriculum Priorities and General Capabilities
	VET & Workplace Learning Leaders Day
	Workplace Learning New Policy Implementation
Developing Culturally Responsive Schools	An Education Worth Having: Supporting First Nations Students to Navigate the Senior Secondary Years of Schooling
	Creating Culturally Safe Classrooms and Schools
	It's a RAP
Governance	Cybersecurity for Boards
	The Legislative and Regulatory Responsibilities Unique to School Boards
	What Does it Mean to be on a School Board?
Inclusive Education	Access and Belonging: Best Practice within the DSE and NCCD
	Behaviour of Students with a Disability: Positive, Proactive and Personalised
	EALD Students in the Mainstream Classroom: Curriculum Accessibility
	Mini COGE (Certificate Gifted Education)
	Supporting and Responding to Children with Challenging Behaviours in Early Learning Contexts
Leadership and Innovation	Working Towards Excellence in Inclusive Education - Reviewing Inclusive Practices
	Building Capacity for School Innovation and Improvement using the AISSA High Impact School Improvement Tool
	Financial Management for Non-Accountants
	Financial Management for School Leaders
	Innovative New Models for Recognition of Holistic Learning
	Leadership in the Early Years
	Leading Change and Innovation
	Principal's and ELC Director's series: Meeting Obligations in Inclusive Education
New Principals Program	
National Assessment Program	Women in Leadership
	2023 NAPLAN Preparation and Protocols: New NAPLAN Coordinators
	2023 NAPLAN Preparation and Protocols: Refresher Training
	2023 NAPLAN: Exploring the Analytical Tool
	2023 NAPLAN: Interpreting and understanding your School and Student Summary Report (SSSR)
Wellbeing	2023 NAPLAN: Supporting Student Accessibility
	Leading Whole School Wellbeing through Innovative Practices
	Youth Mental Health First Aid