

SUBMISSION COVER SHEET



**Review to Inform a Better and Fairer Education System
National School Reform Agreement**

2 August 2023

Organisation:

Independent Education Union of Australia

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Submitted to:

**Expert Panel: Review to Inform a Better and Fairer
Education System**

Introduction

The Independent Education Union of Australia (IEUA) welcomes the opportunity to respond to questions posed in the *Review to Inform a Better and Fairer Education System* Consultation Paper.

The IEUA is the federally registered union representing over 75,000 education professionals (teachers and other education staff) in the non-government sector.

As an invited participant in the Ministerial Reference Group to develop a new National School Reform Agreement, the IEUA observed the extensive, wide-ranging stakeholder engagement undertaken by the Expert Panel leading the *Review to Inform a Better and Fairer Education System*. We note the appropriately diverse range of questions posed in the Consultation Paper and have therefore provided responses to those questions best suited to the priorities and expertise of our membership.

Chapter 2: Improving student outcomes – including for students most at risk of falling behind

What are the most important student outcomes for Australian school students that should be measured in the next NSRA? Should these go beyond academic performance (for example, attendance and engagement)?

Direct and urgent measures are needed to lift up students who are falling behind. Better support for students and reversing educational disadvantage are priority reforms for the IEUA.

The next NSRA should measure improvements in academic performance in consultation with the profession as to what the targets should be, and how measurement can take place without workload intensification for teachers. Attendance and health and wellbeing outcomes for all students, and particularly for First Nations students, remote and regional students, socio-economically disadvantaged students, students with disabilities, and non-ESL students should also be measured. Any proposed measurement should be subject to a rigorous workload impact assessment, that includes genuine consultation with teachers, prior to implementation in schools.

Measurement of student wellbeing should occur alongside measurement of the number and availability of dedicated wellbeing staff in schools and ease of access to allied health services. See also our responses to Chapter 3 questions below.

Measuring student outcomes in the next NSRA should be considered alongside measures to address teacher working conditions, attraction and retention. To deliver for disadvantaged students the new NSRA must also deliver for burnt-out teachers. To provide all Australian students, particularly the disadvantaged, with a high quality and affordable education, all teachers and support staff must have school workplaces free from excessive workloads and unsustainable rates of staff turnover.

Since teacher working conditions are student learning conditions, the NSRA's recommendations on measuring student outcomes must be accompanied by Teacher Workload Impact Assessments, in the midst of the current staffing crisis and on an ongoing basis.

The IEUA asserts that Teacher Workload Impact Assessments should be applied to all educational and administrative initiatives proposed for implementation in schools, not just initiatives arising from the NSRA. The NSRA should embed such a requirement across all initiatives and sectors.

The National Teacher Workforce Action Plan (NTWAP) requires that all NSRA outcomes are subject to a Teacher Workload Impact Assessment (Action 20). This is a critical requirement for success. Any NSRA initiatives, including measurements of student outcomes, must help reduce teacher workload to ensure capacity for teachers to best support student outcomes.

Ongoing consultation with the teaching profession (and other school staff including librarians and cultural competence educators) and their unions is also vital for improving student outcomes, including for students most at risk of falling behind.

What are the evidence-based practices that teachers, schools, systems and sectors can put in place to improve student outcomes, particularly for those most at risk of falling behind? Are different approaches required for different at-risk cohorts?

The Agreement must explore all options for evidence-based practices to better support students, particularly those who have been left behind in the schooling system.

Consultation with the teaching profession and data collection should both inform understanding of how to effectively tailor approaches for different at-risk cohorts, supported by a fully funded public education system, and require private employers to fund the most effective approaches. Consultation with teachers and data gathering should also be subject to a Teacher Workload Impact Assessment, as per the NTWAP and numerous enterprise bargaining agreements.

How can all students at risk of falling behind be identified early on to enable swift learning interventions?

The primary measure to enable swift learning interventions is to reverse the teacher shortage crisis, given the fundamental role of teachers in supporting student learning outcomes and the importance of the teacher-student relationship.

The IEUA also supports the ethical use of data to better inform swift learning interventions and target resources to boost student outcomes. However, care needs to be taken that the collection of data does not place an extra burden on teachers or school leaders (see below responses to Chapter 6 questions).

The application of the Teacher Workload Impact Assessment as per the NTWAP will be an important aspect of the use of data to identify and intervene early to support students at risk of falling behind.

Should the next NSRA add additional priority equity cohorts? For example, should it add children and young people living in out-of-home care and students who speak English as an additional language or dialect? What are the risks and benefits of identifying additional cohorts?

The IEUA strongly supports the intention for the new agreement to target educational disadvantage in remote and regional Australia and within our First Nations communities.

However, it is also vital that the next NSRA agreement explores all options to better support all students who have been left behind, or been left out of, our schooling system. Additional priority equity cohorts should include students from non-ESL or dialect backgrounds, students living in out-of-home care, and students from households living in poverty.

The benefits of identifying additional cohorts include corresponding opportunities for additional, compensatory support measures, such as intensive or small group tuition to allow all those left behind to catch up, rather than allowing disadvantage to be compounded as these students travel through the education system. Sufficient resourcing from the Commonwealth and employers will be critical.

We note that this Review will not examine the calculation of the Schooling Resource Standard. However, the IEUA asserts that a critical step in mitigating the risk of insufficient resourcing in relation to additional priority cohorts is to fully fund the public sector through the provision of 100 per cent of the Schooling Resource Standard for every public school in the country, as advocated by the AEU.

A 100% fully funded public school system is necessary to realise the principle of equity presented in the consultation paper.

Further, funding for additional priority equity cohorts should be transparent and accountable so that school staff, families, communities and the Minister have full confidence that targeted funding is actually used for the benefit of additional priority equity cohorts.

How should progress towards any new targets in the next NSRA be reported on?

Progress towards any new targets in the next NSRA should be reported regularly and with full transparency and accountability, and with possible alignments with Closing the Gap education outcomes reporting.

Chapter 3: Improving student mental health and wellbeing

What does it look like when a school is supporting student mental health and wellbeing effectively? What is needed from schools, systems, government and the community to deliver this?

What is needed from schools, systems, government and the community is to make student wellbeing of paramount importance by investing adequate resources and ensuring targeted and transparent funding. This includes a fully funded public education system, easy access to allied health services for government and non-government schools, teacher release time, quality professional development and enhanced pay scale progression for teachers and support staff, and a Teacher Workload Impact Assessment as per the NTWAP.

Given the rise in student mental health issues, and the unrealistic expectations and obligations placed on teachers to monitor and support students' mental health, it is vital for student and teacher mental health that a Teacher Workload Impact Assessment is undertaken and that dedicated and trained wellbeing staff are allocated to schools. In spite of clear and present need, this is still not the case in 2023.

Specialist responsibilities cannot be added to already overloaded classroom teachers or leadership team members who are not necessarily equipped or able to provide such support. Targeted funding to improve access to allied health and wellbeing support is needed, otherwise the responsibility will continue to fall on teachers.

Should a wellbeing target be included in the next NSRA? Could this use existing data collections, or is additional data required?

The IEUA supports the use of data to better inform wellbeing targets, and to target funding to boost student wellbeing outcomes, especially for priority equity cohorts.

However, the approach to the existing or expanded collection of data must not place additional burdens on teachers or school leaders, so as not to negatively impact teacher wellbeing and in turn teacher capacity to support student wellbeing. The Teacher Workload Impact Assessment as per the NTWAP must be applied to data collection in relation to wellbeing targets.

Would there be benefit in surveying students to help understand student perceptions of safety and belonging at school, subjective state of wellbeing, school climate and classroom disruption? Would there be value in incorporating this into existing National Assessment Program surveys such as NAPLAN?

Surveys designed to understand students' perceptions of safety and belonging at school, subjective state of wellbeing, school climate and classroom disruption can be beneficial, provided they are conducted on an opt-in basis for students and the survey questions are developed in consultation with the profession.

A school level commitment to student wellbeing is needed, and the government and employers must ensure that surveys and other data collection tools aimed at better understanding student wellbeing do not increase teachers' workloads overall.

Any new or expanded surveys or other data collection tools introduced by the new NSRA should - as with all NSRA outcomes - be subject to the Teacher Workload Impact Assessment required by NTWAP.

To what extent do school leaders and teachers have the skills and training to support students struggling with mental health?

The work of supporting students struggling with mental health needs to be primarily shifted to allied health services.

However, teachers and school leaders should also have time release to participate in professional development to enable them to recognise and support students with mental health burdens, including where it may be appropriate to refer students to allied health services.

What can be done to establish stronger partnerships between schools, Local Health Networks and Primary Health Networks?

The co-location of services, with Local Health Networks and Primary Health Networks being established in geographical proximity to schools and being proportionately resourced, is one measure to establish stronger partnerships between schools, Local Health Networks and Primary Health Networks. The panel should also consider subsidy options that would encourage private practitioners to engage with schools to establish partnerships with Local Health and Primary Health Networks.

What can be done to ensure schools can easily refer students to services outside the school gate that they need to support their wellbeing? How can this be done without adding to teacher and leader workload?

The co-location and geographical proximity of services to schools, and having well resourced schools and external services, including through subsidies or incentives, are measures to ensure schools can more easily refer students to services outside the school gate that are needed to support student wellbeing.

Any measures to this end must not add to teacher and school leader workload and, as with all NSRA outcomes, must be subject to the Teacher Workload Impact Assessment required by NTWAP.

Chapter 4: Our current and future teachers

What change(s) would attract more students into the teaching profession?

Guaranteed support for early career teachers would attract more students into initial teacher education and encourage transition into the teaching profession.

The IEUA notes the appropriate focus on early career teachers in the NTWAP and the development of national guidelines to support early career teachers (Action 14).

Funding to school employers should be contingent on the demonstrated delivery of best practice early career teacher support strategies including mandatory induction programs, reduced teaching loads in the initial years of teaching, and resourced mentoring programs that provide paid release time for the teacher and their mentor.

Access and support that encourages enrolments in initial teacher education programs for First Nations teachers will be crucial, as will avenues for training Aboriginal and Torres Strait Islander school support staff.

What change(s) would support teachers to remain in the profession?

The NSRA must deliver practical and enforceable reforms to school workplaces in the midst of the prolonged teacher shortage and crisis in teacher attraction and retention. Reducing teacher workload and burnout is a priority reform for IEUA.

The NSRA review's Terms of Reference rightly include consideration of how the next agreement can support schools to retain and attract teachers.

In considering the NSRA review in conjunction with the NTWAP, more practical and enforceable outcomes are needed to provide a genuine response to teacher workload. The current NTWAP fails to provide systematic workload reductions.

To support teachers to remain in the profession the priority measures needed are:

- *Nationally Endorsed Curriculum or Assessment Resources*
The IEUA supports the development of nationally endorsed curriculum or assessment resources under the National Policy Initiatives (as a new NPI), provided that they continue to operate on an 'opt-in' basis. School employers must be encouraged to endorse such resources, or alternatively, supply their own resources while avoiding unnecessary duplication or overlay of tasks.

Better utilisation of national education institutions, such as AERO and AITSL, could form the basis of the NPI under the next NSRA. The IEU is supportive on the condition that non-government schools are encouraged to adopt resources provided by such agencies without additional overlays imposed by employers.

- *Employers should not exceed standardised and streamlined compliance requirements*
Increasing support staff duties will help with low-value tasks. However, high-value compliance is normally a teacher's responsibility and is often duplicative or excessive. Since workload is usually process-driven, duplicative and excessive requirements could be addressed quickly and at low cost.

The Department of Education should, in consultation with education unions, initiate a review of school compliance regulations imposed by education departments and regulatory authorities to identify and eliminate duplication and excessive work tasks. Funding to school employers should be dependent on adherence to streamlined compliance requirements, with schools required to demonstrate that they have not overlaid additional or excessive requirements (e.g. NCCD reporting, Teacher Performance and Development Framework etc).

Requiring schools to refrain from adding overlays as a condition of funding would focus attention on over-compliance and reduce unnecessary workload.

- *Employer resourcing of additional support staff*
The NTWAP consideration of increasing school support staff responsibilities (Action 21) will be a partial measure to ease the workload burden on teachers. However, for such a plan to succeed at the school level, additional employer resourcing is needed to increase support staff hours to take on such duties.

The majority of support staff are employed part-time and would welcome the option of additional paid hours if they were made available. Further, the IEU notes that many collective agreements in our sector already contain provisions that enable additional support staff duties to assist teachers; however, in practice they fail to provide any material benefit unless the employer allocates additional resources to fund increased support staff hours.

Ongoing consultation with the teaching profession (and other school staff, including librarians and cultural competence educators) and their unions is also fundamental for establishing and maintaining the conditions and environment that will support teachers to remain in the profession.

What change(s) would support qualified teachers to return to the profession?

The changes that would support qualified teachers to return to the profession include the same measures that would support teachers to remain in the profession. As outlined immediately above, the primary measures needed are:

- meaningful actions to address teacher workload, such as nationally endorsed curriculum or assessment resources
- an expectation that employers adhere to standardised and streamlined compliance, without adding additional overlays, as a funding requirement
- resourcing provided by employers for additional support staff hours and responsibilities

Additionally, more flexible working arrangements, a reduced teaching workload, and better transition to retirement options would attract teachers considering returning to the profession, and assist with retaining teachers in their later career stage. These changes would enable teachers to contribute professionally while undertaking the many caring and other duties which often present themselves in later life.

Current enterprise agreements within the non-government sector, supported by Federal industrial laws, provide for the right to request flexible work arrangements. There are some successful examples of flexible work and transitional arrangements in non-government schools. However, in the main, the provisions for job share arrangements, part time and transition to retirement have remained mostly unimplemented. Principals have remained unsupported by the sector in finding ways to successfully implement these provisions and resorted to simply placing these requests into the 'too hard' basket, forcing staff to find other alternatives, such as resignation.

The new NSRA could consider the development of guaranteed transition to retirement programs, negotiated with schools and education unions to support teachers to return to the profession, and to remain renewed and energised.

What additional reforms are needed to ensure that the schools most in need can support and retain highly effective teachers?

Reforms needed to ensure that the schools most in need can support and retain highly effective teachers include the same measures that would support teachers to remain in the profession. As outlined above, primary measures needed are:

- meaningful actions to address teacher workload, such as nationally endorsed curriculum or assessment resources
- an expectation that employers adhere to standardised and streamlined compliance, without adding additional overlays, as a funding requirement
- resourcing provided by employers for additional support staff hours and responsibilities.

Additionally, improved automatic pay scale progression and financial incentives to assist with staffing disadvantaged schools, and the provision of appropriate and structured time release, will improve the capacity of schools most in need to retain highly effective teachers. Improved retention of experienced teachers will secure the added benefit of capitalising on their value as mentors.

What can be done to attract more First Nations teachers? What can be done to improve the retention of First Nations teachers?

Issues arising from the national teacher recruitment and retention crisis have underlined the acute shortage of Aboriginal and Torres Strait Islander teachers and support staff.

Improving access and support for Aboriginal and Torres Strait Islander teachers (and support staff), consistent with the NTWAP and the NSRA review, will go some way to improving the representation of First Nations educators in the education workforce.

Access and support that encourages enrolments in initial teacher education programs for First Nations teachers will also be crucial, and should be developed in consultation with their representatives, as will avenues for training Aboriginal and Torres Strait Islander support staff.

Are there examples of resources, such as curriculum materials, being used to improve teacher workload or streamline their administrative tasks?

The IEUA supports the development of nationally endorsed curriculum or assessment resources under the NPI to improve teacher workload and streamline administrative tasks, provided that they continue to operate on an 'opt-in' basis. School employers must be encouraged to endorse such resources, or alternatively, supply their own resources, while avoiding unnecessary duplication or overlay of tasks.

Chapter 5: Collecting data to inform decision-making and boost student outcomes

What types of data are of most value to you and how accessible are these for you?

The IEUA supports the use of data to better inform educational decision making and target resources to boost student outcomes. However, care needs to be taken that the collection of data does not place an extra burden on teachers or school leaders. The application of the Teacher Workload Impact Assessment will be important to the success of the NSRA outcomes.

Should data measurement and reporting on outcomes of students with disability be a priority under the next NSRA? If so, how can this data be most efficiently collected?

Data measurement and reporting on outcomes of students with disability should be a priority under the next NSRA. Funding transparency and accountability for students with a disability or identified learning needs must be improved, including through the use of data.

School staff and families must have full confidence that targeted funding is actually used for the benefit of the individual student or specific area of need.

Is there a need to establish a report which tracks progress on the targets and reforms in the next NSRA? Should it report at a jurisdictional and a national level? What should be included in the report?

Establishing a report to track progress on the next NSRA's targets and reform can enhance accountability for progress. Consultation with the teaching profession and their unions in the interpretation of data relevant to targets and reforms should also be prioritised. However, the collection and interpretation of data, as a tool to address disadvantage, must not become another workload burden for teachers, particularly in the absence of release time and sufficient resourcing.

The Productivity Commission and AERO have identified 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. Should this be the key data reform for the next NSRA?

While the advice of the Productivity Commission and AERO needs to be taken seriously, care needs to be taken that data collection does not place extra burdens on teachers.

Chapter 6: Funding transparency and accountability

Are there other objectives for funding accountability and transparency we have missed?

Our nation's schools deserve every resource needed to deliver the best education possible. The NSRA policy framework must give teachers and support staff the funding and tools to make this a reality, including through needs-based targeting of funding and improvements to funding accountability and transparency.

How can governments make better use of the information already collected and/or published to achieve the objectives?

Ongoing consultation with the teaching profession and their unions will support better use of information to achieve desired NSRA outcomes.

What are the priority gaps in the current funding transparency and accountability arrangements from your perspective?

A review of loadings and funding for disadvantaged students, regardless of location or circumstance, is urgently required. This should include greater transparency and delivery of funding to targeted areas.

Transparent delivery of funding to areas of need is best supported and accompanied by establishing a 100% fully funded public school system. The IEUA supports the AEU's "For Every Child" campaign, launched in Canberra on 2 August 2023, which aims to secure full funding of Australian public schools by 2028.

CONCLUSION

The IEUA urges the government to prioritise the voice of the profession during the NSRA Review through genuine consultation with classroom teachers and their unions.

Our union remains ready to engage with governments and other stakeholders to meaningfully address the challenges posed and opportunities offered in our quest for a better and fairer education system for all students.