

Appendix 1 AEU response to the consultation questions

The AEU's response to each of the consultation questions posed by the Panel is outlined in this Appendix along with case studies of positive interventions that could be implemented more widely with greater investment.

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

1. 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)?

The current NSRA has not succeeded in closing the achievement gaps between students in priority cohorts and all students and has not succeeded in illuminating the impact of school segregation and the substantially different social, geographic and economic contexts of schools on student outcomes. Nor has it succeeded in providing the opportunity for all students to reach their potential.

The next NSRA should prioritise the achievement of equity and positive student outcomes across all student cohorts. As part of this goal, measures should include reports of the systemic barriers to learning including socioeconomic disadvantage and shortfalls in funding, and progress towards reducing educational and social stratification in schools via national, state and regional level reports of the uneven enrolment of disadvantaged students. It should also include measures, such as those outlined in table 1, to ensure that all students can thrive at school.

Such measures could be included in a new Measurement Framework. The new measurement framework would enable the NSRA and the Australian Curriculum, Assessment and Reporting Authority (ACARA) to provide appropriate government accountability for the learning of priority student cohorts including by identifying resourcing needs and inefficiencies due to systemic barriers to the learning of all students. Students within priority cohorts should certainly be a focus of any new measurement framework, but the framework must also demand that signatory governments act to ensure that the needs of all students are met.

In recognition of the existing uneven playing field due to unfair funding arrangements, the greater student need present within public schools, the collaborative nature of the teaching profession, and the existing teacher shortages driven in large part by workload pressures, accountability must lie squarely on governments to provide the necessary resources for every child to reach their potential. Increased scrutiny and measurement of individual public schools, teachers and principals would be counterproductive and misdirected, given the predominantly systemic barriers to learning and equity. Further, any increases in administrative workloads on teachers and principals resulting from increased compliance, measurement and/or reporting requirements would only contribute to extant teacher burnout and retention problems. This would undermine one of the key goals of the NSRA Review, to attract and retain teachers.

The 2022 NAPLAN written national report excluded the relationship between socioeconomic background and student outcomes. This downgraded the prominence of the role of socioeconomic disadvantage in student learning and is inconsistent with the aim of this enquiry “to inform a better and fairer education system” and its focus on equity. As a prime contributor to inequality in both opportunity and in outcomes, the impact of economic disadvantage and the social segregation that comes from school stratification must be given high priority in all outcome measures.¹

Similarly, it is impossible to examine educational equity without also examining how resources are distributed between schools and systems with varying levels of need and varying capacities to effectively address their needs. Schooling in Australia has operated on an uneven playing field for over decade, which the outcome measures of the next NSRA must recognise and seek to remedy by including the following outcome measures:

1. Report student achievement and the effects on learning growth of student socioeconomic background against ACARA’s measure of socio-educational advantage, rather than only reporting against parental categories of education and occupation.
2. Restore the reporting of the effects of socioeconomic background and disadvantage on student outcomes to the written National NAPLAN report.
3. Develop measures and reports of systemic barriers to the learning of student equity groups, including funding shortfalls.
4. Develop measures and reports of systemic barriers to the learning of all students, including funding shortfalls.
5. Include the measurement of the concentration and uneven enrolment of students from disadvantaged households and from priority equity groups at national, state and regional levels.²

2. 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?

This response is included in the body of the submission.

Improving student outcomes is inextricable from addressing education equity.

No evidence-based practice, regardless of government mandate or resourcing will ever overcome systemic underfunding, under resourcing of education in Australia. Any assertion that any singular evidence-based practice for nurturing learning is deeply flawed. It demonstrates a shallow and false understanding of children and their

¹ MG Sciffer, LB Perry and A McConney, “The substantiveness of socioeconomic school compositional effects in Australia: Measurement error and the relationship with academic composition”, *Large-Scale Assessments in Education*, 10(1), 2022, 21. Available from [\(PDF\) The substantiveness of socioeconomic school compositional effects in Australia: measurement error and the relationship with academic composition \(researchgate.net\)](#), p.11.

² MG Sciffer, LB Perry and A McConney, *Ibid.*, p.11.

development. By the time a child has commenced school, their experiences in the first few years have shaped the synapses in their brain and this will affect their ability to learn the curriculum. Further, as the children and students in Australian public schools reflect the diversity of our modern society: in gender, class, race, ethnicity, and domicile: thus, there can be no single approach.

Equally, just as no single practice can address education inequity, neither can teachers alone. However, there is no solution that does not involve teachers. The voice of teachers whose experience is primarily among the most educationally disadvantaged student cohorts must be central to the consideration of any educational practice.

Education policies should support teacher professional judgment and let teachers teach and leaders lead. Schools and the system operate best on shared values and a common responsibility. For this to occur the system bureaucracy must be closely connected to the culture of public schools. The location of decision making should relate to what is best for student learning across the system.

As such the AEU cautions the Panel against accepting the common narrow interpretation of “evidence-based practices”, which is often a synonym for conformity and compliance. These practices drive stressful cultures based on tests and standardisation¹⁷.

These “evidence-based practices”, deny professional autonomy of teachers to make use of multiple pedagogical approaches that best fit the circumstances and needs of their classes. Any model assumes a sameness of all students in a year level at a certain point in time and does not consider the breadth of individual learning needs of each student, let alone the educational development gaps¹⁸. AEU members’ experiences with such top-down approaches: it intensifies the workload demand of teachers as they are, often with short notice, compelled to redirect their teaching and learning programme to these ‘off-the-shelf’ approaches regardless of the context of the students they teach and learn. A further unfortunate consequence of this is it often drives conflict between teachers and school-based leadership, as they have the managerial responsibility to direct teachers to work. This is unhelpful to building positive school communities, and damages respectful professional collaboration and trust.

The result is a culture that dehumanises teachers. There is strong evidence to say this is a significant contributing factor to teacher attrition and the current teaching crisis (needs reference). The relentless overregulation of the teaching profession only serves to narrow and thus weaken Australia’s education system.

The AEU supports the professional autonomy of teachers to make use of multiple pedagogical approaches that best fit the circumstances and needs of their classes. Teachers must be able to use their professional judgement to make use of a range of bodies of knowledge, from which they select what is relevant and most appropriate to the students in their class. They incorporate multidisciplinary research from fields such as neuroscience, psychology, and education, as well as evolving best practice for cohorts of children at risk such as trauma-informed practice. With sufficient resources and time, teachers differentiate their lesson planning and delivery to suit the specific needs of every child in their classroom.

Furthermore, this narrow evidence-based practices typically prioritise settler-colonial knowledge systems and learning methodology. The next NSRA should also recognise and prioritise Aboriginal and Torres Strait Islander Knowledge Systems and research practices when relying on evidence-based practice using research undertaken by First Nations scholars and academics who are specialists in the field of education.

An example is the failed experiment importing Direct Instruction from the United States to ██████ Schools. For ██████ School alone, it cost nearly \$2 million per year, which was paid to the US Developer The National Institute for Direct Instruction (NIFDI)¹⁹.

In addition to the expensive bill paid to an international company, there are significant education criticisms of this approach, such as:

- Direct Instruction focuses on teacher control of lesson pacing and content and does not encourage the engagement with student cultural resources, background knowledge and community context.
- It deskills teachers by routinizing their work and downplaying their professional capacity to vary instructional pace and curriculum content depending on the student cohort and context.
- It works through strict tracking of student progress and ability grouping, which research shows can severely disadvantage some students.
- Finally, it places the teacher and child in a rigid relationship where the teacher is always the one with the power and knowledge with limited allowance or recognition of individual and cultural difference. This relationship is not conducive to local adaptation of lessons or content to accommodate community, cultural or individual differences, creativity and innovation in teaching and learning²⁰.

The appeal of ‘shortcut’ models, such as Direct Instruction, for education requires careful analysis. Glossy marketing and aggressive PR strategies obscure the real beneficiaries of their ‘educational’ products: it is the entrepreneurs, investors, and publishing companies who benefit. Not Australian students. This global phenomenon has had a devastating impact on equity and fairness in education.

Successful teaching requires the selection of appropriate practises, not the application of a single strategy which has been endorsed as “evidence-based” and then implemented without regard for educational context. For this reason, the AEU supports teachers being provided with knowledge of a range of teaching strategies, and the skills and resources to implement them, in order to make informed judgements as to the most appropriate strategies for a particular student at a given time.

Explicit teaching practices can be valuable, however with respect to varying learner contexts ITE students should be familiar with a broad range of approaches. Prescribed pedagogies must be avoided as they not only undermine teachers’ professional judgement but also inhibit teachers’ growth and development as they learn and experiment with different methods of teaching for different contexts and students - improving student outcomes requires giving teachers the time and space and professional autonomy to do their jobs.

However, it is important to ensure that research and evidence is appropriately contextualised, and that the role of teachers' professional judgement in interpreting research evidence and adapting teaching and learning strategies to local school contexts and diverse student need is not undermined in the next NSRA. Any determination of which classroom practices have the "highest impact" must be based on a broad range of valid, reliable and representative educational studies which utilise rigorous research methodologies, including both quantitative and qualitative methods, and which are sensitive to different national, school and individual student contexts. Importantly, research that focuses upon 'high impact' classroom practices in school contexts that experience high levels of socio-cultural disadvantage, must be included in the research basis.

Ultimately, teachers and school leaders must be empowered to make judgements about implementation that is contextualised for their students, in their school, in their community based on the myriad factors that impact student learning and engagement that can vary from day to day, requiring continual adjustment to responses.

The AEU supports the implementation of best practice in professional learning in order to ensure that theoretical information is transferred into classroom practice where that is necessary, but the AEU explicitly rejects a mandated approach to teaching, as this ignores the individual circumstances of the child; it also limits the benefit that a combination of approaches brings and undermines the professional judgement of teachers.

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

Quality teaching and learning depends on the right staffing levels with an appropriate mix of teaching, specialist and education support personnel to cater for the needs of every child. Early intervention for students at risk of falling behind is more important than ever where the diversity of students in public schools and the complexity of their needs has increased significantly.

Over many years principals and teachers have consistently reported to the AEU through the State of Our Schools Survey that the investments that would make a real difference for identifying students at risk of falling behind in literacy and numeracy, and early intervention to prevent such an occurrence, are smaller class sizes, additional trained support staff in the classroom and intensive small group or one-on-one support programs for children.

Increased access to qualified specialist staff would also make a real difference for students with additional needs. Teachers need more time for lesson planning and professional collaboration with their colleagues.

Case Study: The success of small group tutoring in a regional Victorian primary school

A qualified teacher engaged as a tutor writes:

“The post-COVID tutoring has been very helpful for students with additional needs who suffered badly from the lockdowns. They lost routine, which many rely on to manage their day, and missed medical and paediatrician appointments. They became emotionally and behaviourally dysregulated. The Foundation and Year one students missed the introduction to school routine. They struggled with cooperating with their peers and engaging in small group work. I was employed under the tutoring program. I worked with eight of the thirty-five students for half-an-hour each (four hours in total per week) all with additional needs. Individual schools were free to choose how to use the funding and could customise their programs to the needs of the school and students. The tutoring funding made a huge difference to those vulnerable students.”

As pointed out by the NSRA Review Panel, these investments are supported in recent research. In a national survey this year, over 50% of parents and guardians said that access to small group and individual tutoring would assist their child.³

The Productivity Commission has also identified support staff and small group learning as two investments that would make a difference, pointing to research showing they improve outcomes.⁴ Small group tutoring has been a short-term response to the COVID-19 pandemic in some states, however these programs are most effective when they are integrated permanently into a whole-school approach to high-quality teaching, a point emphasised in this Review’s Consultation Paper.

Teachers are constantly engaged in assessing their students’ progress, they know their students and know what they need. Authentic student assessment informs teachers, not only about the strengths and weaknesses or the risk of falling behind of particular students, but also about the value of a particular teaching program or strategy for that student. Qualified teachers have the professional skills to implement appropriate programs and support that meet the needs of the students in their classes on a continual basis. They use a variety of assessment tools to gauge student’s performance and identify the support those students need. The best feedback for improved student learning is targeted and immediate.

³ Department of Education, Initial consultation survey, Expert panel for the Review to Inform a Better and Fairer Education System, May/June 2023

⁴ Productivity Commission, Review of the National School Reform Agreement, Study Report, December 2022

The issue is not that new basic skills tests or measurement scales are required to identify students at risk of falling behind - it is that teachers in public schools do not currently have the resources or time available to allow them to provide additional individual support that they know these students need.

The introduction of a National Policy Initiative requiring governments to resource schools to allow teachers to undertake authentic teacher-controlled formative assessment of their students for the permanent provision of qualified teacher tutors for the purpose of early intervention for those identified as at risk of falling behind would go some way towards ensuring that those students falling behind is not an inevitability.

The AEU also recommends that the next NSRA include targets for reducing class sizes and for the establishment of permanent small group or individual tutoring program conducted by qualified and accredited teachers in every school.

4. 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?

Associate Professor Rachel Wilson makes the compelling argument that education systems cannot achieve what they do not measure, and that equity, particularly in relation to equality of outcomes, has not been adequately monitored in Australia's educational systems. Wilson argues that this is why governments have not prioritised equity in schooling despite it being rhetorically endorsed in numerous education declarations over the last two decades from the Hobart Declaration in 1989 to the Alice Springs (Mparntwe) Education Declaration in 2019.⁵

For this reason, the AEU encourages further equity cohorts being identified and included in the monitoring of the next NSRA. The AEU supports the inclusion of children in out of home care as a priority cohort in the next NSRA.

It is important to recognise, however, that for priority equity cohorts including children in out of home care and children from refugee backgrounds, that there are many factors beyond school that affect their educational outcomes. Supports for these children include access to torture and trauma counselling, specialised health services, bilingual support and intensive English language support to name but a few. It cannot be the responsibility just of the public school system to affect change in this regard – we need improved and holistic social service provision including social care, mental and physical healthcare and housing support. Public services, including education, should be properly funded to provide the necessary services to these student cohorts, which include but are not limited to intense support resourcing, English language support, and school-based trauma informed practices.

⁵Wilson, R. Presentation available at <https://static1.squarespace.com/static/60d14074f91b5b0fddfa9652/t/6216c780ebd92262f0eee2d6/1645660045419/Rachel+Wilson+Excellence+and+Equity+-+PowerPoint.pdf>

The AEU supports the Panel's suggestion of making students with English as an additional language or dialect an additional priority equity cohort. This is important for students from new arrival and migrant families. It is also important for First Nations students. Many Aboriginal and Torres Strait Islanders students, particularly in remote communities, live in communities where English is spoken little outside of school, and therefore have little exposure to English. They share a language other than English with most of their classmates and school staff, their parents and other family members may have limited English and/or limited literacy. Literacy may not be embedded as a cultural practice within the community, and they may have little opportunity or incentive to speak English even at school, other than with their teacher.

Case study: Funding for EAL/D students in NSW

In NSW, there are 200,000 students, or one in four, who are identified as requiring English as an additional language or dialect (EAL/D) support across 1,638 public schools. An additional 3,832 new arrival migrant and refugee background students are also funded under the federal government's New Arrivals Program.

In NSW, schools receive an equity loading in the form of English Language Proficiency (ELP) resources to support the additional learning needs of EAL/D students.¹ The resources are a teacher allocation and/or flexible funding, and are based on each school's reported level of EAL/D need. The loading is based on a moderated assessment of student English language proficiency levels which are collected annually via the EAL/D Annual Survey. Support for EAL/D students must be included in the school plan and the Annual School Report each year. Schools receiving an EAL/D loading must develop an explicit strategy to meet the English language learning needs of their EAL/D students, and determine the most effective way to implement this strategy and improve educational outcomes.

It is also recognised that there are different types of EAL/D learners each with their own specific learning needs. In addition to Aboriginal background equity loading funding, Aboriginal and Torres Strait Islander students enrolling in school who speak a traditional Aboriginal language as their main language of everyday use or a creole, and require intensive English language support, receive additional ELP resources or targeted funding under the EAL New Arrivals Program. In addition to receiving ELP funds, schools with newly arrived and refugee background students may also apply for additional resources for targeted support. Significantly, this includes staffing allocations for School Learning Support Officer (SLSO) to provide bilingual support for schools enrolling four or more newly arrived refugee or humanitarian program entrants through the New Arrivals Program which provides initial intensive English tuition and additional teacher support for newly arrived students who are at Beginning or Emerging levels of English language proficiency.

Newly arrived primary aged students enrol directly in primary school and receive additional support at school, including through the EAL New Arrivals Program (NAP). Newly arrived high school aged students in metropolitan Sydney and Wollongong enrol in an Intensive English Centres (IECs) or the Intensive English High School (IEHS) for intensive English and high school preparation prior to commencing high school.

These settings provide English language, orientation, and settlement and welfare programs for students to meet their educational needs. If there is no access to an IEC, for example in

The inclusion of EAL/D students as an additional priority equity cohort must involve recognising that there are different types of EAL/D learners each with specific needs. The purpose of identifying EAL/D students as an additional priority equity cohort must be to promote equity, improve learning outcomes and support all students to achieve their potential, which will require the delivery of additional funding according to a rigorous needs-based methodology and an approach informed by national best practice.

However, to truly achieve equity and social inclusion, build upon the support already provided as outlined above, and enable every EAL/D learner to fully participate in school and reach their potential in further study and/or work, it will be necessary to address the significant funding gaps and shortages of qualified teachers (shortages driven by low salaries, ballooning workloads and insecure employment) which create systemic barriers to EAL/D students' acquisition of English language and literacy and access to all curriculum areas.

Unfortunately, in NSW, only 48 per cent of the current EAL/D staffing entitlements allocated to schools are filled by permanent teachers and of the 2173 teachers undertaking these roles, only 58 per cent are EAL/D qualified. This is in a context in 2023 in which enrolments of EAL/D learners have been rising. The needs of IECs in particular are growing, in relation to both infrastructure and the specialist teachers and school counsellors required. Many IECs across NSW are now over capacity or have long student waiting lists. The vast majority are unable to fill their full specialist school counsellor entitlements with appropriately experienced and expert counsellors. All EAL/D students, including children from refugee backgrounds, orphaned children, including those who have experienced torture and trauma, and those experiencing significant intersectional disadvantage, are in dire need of additional support, funding and teachers.

Identification of priority cohorts and measurements of outcomes also needs to recognise the prevalence of compound disadvantage. For example, the NSRA should have a strong focus on the intersecting experiences of First Nations students that reflect almost every priority cohort i.e., geographic location, disability (including limited acknowledgement of diagnosed and undiagnosed disability), in addition to the new cohorts recommended in the Consultation Paper which includes; students living in Out of Home Care (overrepresentation of First Nations students), EAL/D particularly in remote areas of the country and students in the youth justice system (overrepresentation of First Nations students).

There needs to be a consistent approach to the unique position of First Nations students in any initiatives focusing on equity, through centering of Aboriginal and Torres Strait Islander voices starting with the students, decolonization of the educational systems and structures that cause current barriers to Aboriginal and Torres Strait Islander students achieving excellence and equity in the education system.

The AEU recommends including a focus on Aboriginal and Torres Strait Islander Students, students experiencing compound disadvantage and students with English as an Additional Language and/or Dialect including the benefits of bilingual education in the next NSRA.

5. What should the specific targets in the next NSRA be? Should the targets be different for primary and secondary schools? If so, how? What changes are required to current measurement frameworks, and what new measures might be required?

National education policy, and its measurements and targets should involve collaboration between the State/Territory and Federal governments and exist within a framework that enables schools and teachers to exercise their professional judgement and the flexibility to find the most appropriate solutions at the school level. Targets should also not detract from the capacity for innovation in curriculum and assessment at the system and school levels nor lead to over standardisation.

The development of targets must be led by the profession, as the experts with the content knowledge and experience, and responsibility for implementation. In the expectation that the AEU as the voice of profession will be thoroughly consulted on targets as they are developed, we offer some initial proposals.

Fullan's drivers, as outlined in the introduction to this submission, provide an integrated framework to achieving a better and fairer education system. They are:

1. Wellbeing and Learning – focusing on wellbeing drives intrinsic motivation
2. Social Intelligence-embedded collaboration that is inclusive of the culture of the students and school community between educators supporting each other
3. Equality Investments – these produce social and monetary benefits to the system for the foreseeable future
4. Systemness – people at all levels recognise that they have a responsibility to interact with, learn from, contribute to and be a living member of the system as it evolves.⁶

The AEU very strongly recommends that the NSRA measurement framework and targets are decoupled from NAPLAN and that no new initiatives in relation to assessment, reporting, evaluation and accountability are imposed on teachers and principals.

Any new initiatives should only be introduced after the extensive prior consultation and negotiation with the teaching profession and its union the AEU.

Further, the AEU asserts that NAPLAN must be replaced and a new comprehensive assessment framework must be developed that restores teachers' professional judgement of student learning as the prime consideration in its design. This must be done in consultation with educators and their representatives. It must be classroom based and available for use at the best time as determined by the teacher aligned with their curriculum and programs and, that includes significant and meaningful input from the teaching profession at all stages of its development, implementation and evaluation. It must be based on a comprehensive and inclusive sample that takes into account and addresses the wide range of learning needs of students in public schools.

⁶ Fullan, (2011) *Op. cit*, p. 5

There is also a lack of congruity between the goals of the Alice Springs (Mparntwe) Declaration and the current NSRA Measurement Framework. There is poor alignment between education goals and system component parts. System accountability is an expectation, but the focus (and blame) when goals are not met falls disproportionately on schools and teachers. Specifically, goal 2 of the Declaration provides limited data collection to ensure that the range of key performance measures are met, including those focused on developing stronger partnerships, strengthening early childhood education, lifelong learning, and effective transitions, and supporting all young people at risk of educational disadvantage.

What is most notable in the current NSRA Measurement Framework and performance indicators is that there is no consideration of how the system is impacting on those who work and learn within it.

The AEU proposes that the next NSRA should require that all state and territory governments adhere to industrially negotiated class size ranges and limits, and that breaches of agreed limits should be included in annual reporting against NSRA targets.

The AEU recommends that the following targets are included in the next NSRA:

Fixing Teacher shortages

The AEU proposes that there needs to be a national framework for states and territories to regularly and consistently report on the level and impact of ongoing teacher shortages, and that this should be a primary indicator. This has been included as a component of the National Teacher Workforce Action Plan but a well-defined and transparent target within the NSRA is required to ensure action.

Key measurements should include:

- Supply and demand for teachers
- The retention rate of teachers (with a particular focus on attrition and its drivers among early career teachers).
- The reasons for potential attrition among teachers considering leaving the profession.
- Teachers' views of the impact of current assessment protocols.
- The rate of secure employment for teachers (again, particularly for early career teachers).
- The experience of graduate teachers in their transition to the workforce.
- Consideration of teacher to student ratios, class sizes and adherence to industrial agreements in respect of class sizes.
- The ongoing personal and professional impact of high workloads and regular workload monitoring and its relationship to attrition.
- Out-of-area teaching/teaching outside of subject or learning area specialisation.

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

Full curriculum access for regional, rural and remote students

The AEU supports a curriculum guarantee that provides all students access to a rigorous, rich and rewarding curriculum aimed at equipping them with all the knowledge and skills required to be successful in the 21st century and believes this should be reflected in the next NSRA.

We propose a target is included in the agreement that monitors the level of access that students in rural, remote and remote communities have to the subjects that are available to their urban peers, including rates of teachers teaching out-of-area/outside of subject or learning area specialisation.

Adherence to class size limits

Decades of research has repeatedly found that “all types of students benefit from being in small classes in early grades across all achievement tests” and is “an intervention that increases the achievement levels for all students while simultaneously reducing the achievement gap”.⁷ An Australian review of 112 studies spanning 1979-2014 found that “smaller class sizes in the first four years of school can have an important and lasting impact on student achievement, especially for children from culturally, linguistically and economically disenfranchised communities” and that benefits “arise from a mixture of increased time on task, greater opportunities for teachers to tailor their instruction to the students in their class and the positive impact on student engagement behaviours”.⁸ US research shows that “children in smaller classes achieve better outcomes, both academic and otherwise, and that class size reduction can be an effective strategy for closing racially or socioeconomically based achievement gaps”.⁹

Therefore targets should be set to lower class sizes in all jurisdictions and across all sectors of schooling to a maximum of 20 in P/K/R-3, 24 in years 3-6 and 25 in years 7 to 12 taking into account student cohort complexity.

⁷ Konstantopoulos, S., & Chun, V. What Are the Long-Term Effects of Small Classes on the Achievement Gap? Evidence from the Lasting Benefits, 2009, *American Journal of Education* 116

⁸ Zygier, D., Class size and academic results, with a focus on children from culturally, linguistically and economically disenfranchised communities, *Acoustics, Speech, and Signal Processing Newsletter*, IEEE 2014(1)

⁹ Baker, B., Farrie, D., Sciarra, D., *Mind the Gap: 20 Years of Progress and Retrenchment in School Funding and Achievement Gaps*, 2016, <https://onlinelibrary.wiley.com/doi/full/10.1002/ets2.12098>

Reducing school segregation

As detailed in the response to question 1, above, the next NSRA should include a target to reduce educational and social stratification in schools via national, state and regional level reports of the uneven enrolment of students from disadvantaged backgrounds by sector.

Ensuring that all jurisdictions meet their funding contribution targets

All jurisdictions are required to report their final funding contributions each year to the Secretary of the Commonwealth Department of Education, and when agreed funding targets are not met the reasons are examined by the National School Resourcing Board. Despite these requirements, there have recently been reports of some jurisdictions repeatedly failing to meet the specified funding targets from their bilateral agreements.

The AEU recommends that adherence to agreed funding contributions should be included as a target of the next NSRA.

6. How can the targets in the next NSRA be structured to ensure that evidence-based approaches underpin a nationally coherent reform agenda while allowing jurisdictions and schools the flexibility to respond to individual student circumstances and needs?

The current NSRA specifies that “as far as practical reporting requirements under this Agreement and the Act will leverage existing reporting processes and data sources and minimise reporting burdens on school systems and individual schools”¹⁰ However, prior to the signing of the agreement there was a collective failure by governments to consider whether the data that is being collected and reported on is actually the most useful for school staff and students.

The AEU agrees that targets should leverage already existing data in order to minimise the huge compliance and data collection burden that teachers’ experience, and that the objectives, targets and outcomes of the next NSRA must be defined in consultation with teachers and with clear benefit for teachers and students.

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

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

¹⁰ National School Reform Agreement, *Op. cit.*, p.11.

Additionally, many of the performance measurements cited by States and Territories in their annual reports are heavily reliant on NAPLAN, a single test in time assessment that is not fit for that purpose with an inequitable application nation-wide. As a result, there is limited alignment between the NSRA and its key objectives, outcomes and targets and the communities that are directly impacted by them. The next iteration of the NSRA targets and reporting framework must involve significant consultation with teachers, who must be given the opportunity to engage in a genuine and beneficial way with any proposed objectives, targets and outcomes of the next agreement.

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

Since teachers face pressure to improve scores and since poverty-stricken students generally underperform on high-stakes tests, schools serving low-income students are more likely to implement a style of teaching based on drilling and memorization that leads to little learning. This form of instruction leaves few opportunities for disadvantaged students to make progress and contributes to unscrupulous practices, such as lowering proficiency scores, holding students back to prevent them from taking tests, and even falsifying students' scores¹¹.

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

- Support inclusive teaching and learning practices.
- Inform the teaching and learning cycle and to provide teachers, students and parents with information about the progress and achievements of students.
- Form an integral component of the ongoing planning and modification of educational programs and practices and the targeting of specific resources.

All targets and reporting processes, and assessment and reporting frameworks and practices, must be informed by classroom experience and teacher professional judgment, which requires deep engagement by governments with the teaching profession. They must be transparent in terms of their intent, their relationship to the curriculum and student outcomes, and in what is being measured and how it is being measured.

¹¹ Morgan, H. (2016). Relying on High-Stakes Standardized Tests to Evaluate Schools and Teachers: *A Bad Idea, The Clearing House: A Journal of Educational Strategies, Issues and Ideas* Vol. 89, Issue 2. Retrieved from <http://www.tandfonline.com/doi/full/10.1080/00098655.2016.1156628>

Improving student mental health and wellbeing

This response is included the body of the submission.

The wellbeing of students has a direct impact on their engagement in education and the results they achieve. This makes the provision of well-resourced teaching and learning programs critical. Student wellbeing, mental health and the impact of trauma is a significant and growing issue for schools and has been exacerbated by the difficulties of students and school staff in dealing with both the short- and long-term challenges presented by COVID-19. Similarly, many schools and students are still reeling from trauma and damage caused by the climate driven fires in Victoria and NSW in 2019 and 2020¹² and unprecedented severe floods in Queensland and NSW in 2022.¹³

Research released in 2021 found seven in 10 parents and carers of young people aged 15-18 reported worsening mental health conditions for their children due to COVID-19.¹⁴ This year, over 70% of principals reported a decline in student wellbeing and engagement in the past 12 months, with 27% saying there has been a significant decline in wellbeing.¹⁵ A 2022 survey of over 6000 Australian school students found that wellbeing declines across multiple domains as they progress through from the early primary years to Year 12.¹⁶ The Productivity Commission's Mental Health inquiry found many schools have policies and support systems in place to achieve positive student mental health and wellbeing outcomes, but this is not the case everywhere.¹⁷ Principals and teachers report they are left by the education system to navigate through copious wellbeing policies and programs without the support, time and resources to choose and implement the most effective ones. Teachers also report a lack of available support for students identified as at risk of poor mental health or show signs of poor wellbeing. There is a shortage of school counsellors, particularly in rural and remote areas, and not all schools in Australia are funded to have an appropriately qualified (and preferably dual qualified teacher/counsellor) qualified school counsellor on staff. Counsellors report crippling workloads, long waiting lists and a need to prioritise support based on the risk of harm rather than when concerns are first raised.¹⁸ The current provision and shortage of qualified school counsellors also means that students are going without disability assessments and early interventions.

¹² <https://www.abc.net.au/news/2022-12-21/bushfire-covid-mental-health-corryong-college-vce-top-state/101780328>

¹³ <https://www.smh.com.au/national/nsw/class-on-the-grass-flood-hit-schools-face-years-of-disruption-20220325-p5a7w7.html>

¹⁴ Biddle, N., Edwards, B., Gray, M. & Sollis, S., The impact of COVID-19 on child mental health and service barriers: The perspective of parents, August 2021, Australian National University Centre for Social Research and Methods

¹⁵ Australian Education Union, State of Our Schools 2023, Unpublished survey data

¹⁶ Buckley Flack, C., Schoeffel, S., Walker, L., Bickerstaff, A., Wellbeing for Learning: Evidence brief on Student wellbeing from a pilot in schools, Pivot Professional Learning 2022

¹⁷ Productivity Commission, 2020, Mental Health, Report no. 95, Canberra

¹⁸ The Daily Telegraph, Shortage of NSW school counsellors leaving many students without the help they require, November 2022, retrieved from <https://www.dailytelegraph.com.au/news/nsw/shortage-of-nsw-schoolcounsellors-leaving-many-students-withoutthe-help-they-require/news-story/44d7e7b1f91975b47c5f946c5767dc13>

In the AEU’s State of Our Schools Survey 2023 principals and teachers were asked to identify the extent to which student wellbeing had changed over the past year. The results show a significant and uniform negative impact across these areas. It is worth noting that the declines in student wellbeing and engagement recorded in 2023 exceed those recorded in the 2021 survey, conducted during term 3, at the height of COVID disruption and when NSW, Victoria and the ACT were engaged in extended periods of remote learning.

The survey results showed that:

- 27% of principals said that student wellbeing had “declined significantly” in the last year, compared to 17% in 2021.
- 23% of principals said that student engagement had “declined significantly” in the last year, compared to 18% in 2021.
- 25% of teachers said that student wellbeing had “declined significantly” in the last year, compared to 18% in 2021.
- 23% teachers said that student engagement had “declined significantly” in the last year, compared to 18% in 2021.

8. 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?

An ideal approach to supporting student mental health and wellbeing would be a ‘wraparound’ model of service provision that is already operating in some limited cases. To be successful, such a model must be supported through proper provision of social welfare and public services. This is acknowledged by the ACT Government Education Directorate’s own ten-year strategy, *The Future of Education*:

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

Case Study: In the ACT Teacher and School Psychologist shortages hamper innovative approaches to student wellbeing

In the ACT, acute shortages of teachers and psychologists have limited the full expression of this vision. It has been partially implemented through programs such as:

- *A pilot of free breakfasts and lunches provided for students at selected schools.*
- *A centralised and multidisciplinary Clinical Practice Team staffed with psychologists, social workers, occupational therapists, physiotherapists and speech pathologists who accept referrals from every public school.*
- *Recent funding of an Inclusive Education Coach program, where teachers with qualifications and/or experience in inclusive education for students with disability will have dedicated roles to support inclusive practice across an entire school.*

The ACT has a particular emphasis on early childhood development, which includes:

- *Community Coordinator positions at preschools that serve vulnerable families, whose roles facilitate referrals between schools and social and/or health services.*
- *A Koori Preschool program offered free to all Aboriginal and Torres Strait Islander children aged 3-5 years, where cultural safety frameworks and curricula were co-designed with the Aboriginal and Torres Strait Islander community.*
- *A Preschool Pathways Partner program which provides targeted coaching on inclusion and transition practices, facilitation of connections between ACT public preschools, families and schools to enhance transitions, and professional learning suited to particular student needs.*
- *A Child Development Service that offers assessment, referral, information and linkages for children aged 0 to 6, where there are concerns about their development. This service also offers early intervention therapy, regular and free drop-in clinics for speech pathology, occupational therapy and physiotherapy, and free Autism Spectrum Disorder assessments for children aged up to 12 years.*

School leaders have consistently expressed frustration to the AEU at the thresholds set by support services before they will become involved. In particular, one school reported to the AEU that they had been advised by Child and Youth Protection Services that they would not become involved in a serious and escalating mental health crisis because the student involved was not suicidal and that they expected the school to provide mental health crisis support. While it is acknowledged that this may be a symptom of systemic issues in mental health services across the whole community, it cannot and must not be used to abrogate the responsibility of one public service to another. Schools can and do provide support for student mental health and wellbeing but must themselves be supported by the public services established for that purpose.

Staff in all roles in schools are often required to devote significant additional time and resources to meet the needs of their students and their families. Schools are currently called on to devote additional time and resources to attempting to find ways to provide support to students' families that are well outside of any educational role. With limited time and resources, schools should not be forced to choose between ensuring wellbeing and the work required to implement high quality teaching and learning programs.

In addition to properly-funded 'wraparound' support services to schools, the crippling shortage of qualified school counsellors must be addressed by filling existing vacancies and increasing the ratio of school counsellors to students. The Gallop Inquiry in NSW recommended a guaranteed minimum of at least 1 school counsellor for every 500 students to "address the significant increase in student health issues". Provision of school counsellors must be driven by student need recognising student location and concentrations of socio-economic disadvantage. The above ratio cannot be achieved without significant increases in funding, for example, to offer attractive re-training scholarships for teachers to re-train as qualified school counsellors.

Case study - Counsellors in NSW schools

In 2018, the then NSW Government supported a parliamentary inquiry's recommendations for a minimum ratio of one school counsellor per 500 students but that ratio has never been achieved. There were 75 vacant counsellor positions in November of 2022 and more than 300 schools have less than two hours a week of counselling support.

In 2023, the NSW Government announced a significant investment in the provision of school counsellors to address the shortfall in support for students in the form of \$75 million to recruit additional school counsellors. This would mean 50 new counsellors in 2024/25, 100 in 2025/26, and 100 in 2026/27.

This announcement was an important first step toward reaching the ratio of one school counsellor to every 500 students recommended by the Vinson Inquiry in 2002 and two NSW Legislative Council inquiries in 2010 and 2017, and beginning to address the growing mental health crisis in NSW schools. The commitment to employ additional school counsellors is a vital step towards ensuring that students who need help can get it.

9. What evidence-based wellbeing approaches currently being implemented by schools and communities should be considered as part of a national reform agenda?

The two case studies of state based positive mental health and wellbeing interventions in schools are presented below.

Case study: Mental Health Practitioner Program in Victoria

A primary school teacher from metropolitan Melbourne, says:

“In our State School Primary setting, funding for the Mental Health Practitioner program has been beneficial in terms of.....

- *support for principals, leadership, welfare leaders, classroom teachers and educational support staff in regards best practise for working with students in need*
- *expertise and advice for staff working with students in need*
- *covering elements of Social and Emotional Learning, RRRR and mental health strategies and approaches in a more effective and appropriate setting*
- *allows time and space for students with behavioural, emotional and mental health needs*
- *reduces impact on other students”*

Case study: Wellbeing Workforce in Queensland State Schools

The purpose of the Wellbeing Workforce Initiative is to increasing the number of wellbeing professionals based in state schools to respond to the increasing complexity of student mental health and wellbeing needs.

The current surge of concern relating to the emerging complexity of mental health and wellbeing of young people in Queensland is well documented. Schools are increasingly being called to respond to mild to moderate mental health concerns and to support referrals for more complex or severe mental health concerns. Australian Education Union Queensland Teachers Union Branch (QTU) school leaders are communicating that student wellbeing needs are increasing exponentially with respect to complexity and vulnerability and that they are struggling to respond without access to additional wellbeing professionals within their school community.

The Department of Education (Queensland) Wellbeing Workforce initiative is responding by providing school-based access to psychologists, guidance officers (with a counselling focus), social workers and youth workers. A component of the Wellbeing Workforce also includes a trial of GP's in schools with secondary enrolments. The intent is for these wellbeing professionals to operate in an integrated and responsive manner with existing school-based staff.

This initiative sits alongside the Queensland Engagement and Wellbeing Survey that is offered to all Queensland state schools to voluntarily participate in to enable school-based data gathering to monitor school culture, student engagement and student wellbeing on an annual basis.

The Wellbeing Workforce implementation commenced in 2022, and whilst the initiative is in initial phases, QTU school leaders and members are speaking very positively about the increased level of support for students, families and school communities.

The initiative has state-wide coverage with even small schools being supported to cluster resources in order to gain access to wellbeing professionals that would previously not have been possible. QTU school leaders and members have noted:

- *Recruitment processes have been successfully coordinated between regions and schools with support for onboarding and ongoing technical supervision.*
- *Take up rates for the school-based services offered are high.*
- *Resulting in more expedited support for students when they need it most.*
- *Greater range of students and families are able to access proactive and appropriate mental health wellbeing support.*
- *The location of school-based wellbeing professionals has enabled bespoke models of wellbeing support that can be tailored to each school's needs and existing staffing resources.*
- *QTU school leaders and members describe the positive impacts of increased engagement in learning.*

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

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

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

The AEU welcomed the Student Wellbeing Fund announced in the October 2022 Commonwealth Budget, but we note that those measures expire over the next two years. Increased and consistently accessible funding is required to maintain student wellbeing and to ensure that upgrades continue to be made and are maintained in the future. The next NSRA needs to ensure that an adequate ratio of counsellors and welfare support workers to students is instilled, with a target of a minimum of 1 to 500 in primary schools and 1 to 250 in secondary schools.

In addition, the wellbeing target set within the NSRA should require state governments to ensure that all schools are able to meet the needs of all students who need to access the school counsellor or wellbeing officer.

11. 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?

In the AEU's 2023 State of Our Schools survey 87% of principals and 89% of teachers said that they observe that NAPLAN contributes to the stress and anxiety of students, with 34% of principals and 40% of teachers respectively saying it "greatly contributes to students stress and anxiety."¹⁹

It is clear from these results, which have been consistent over a decade that the survey has been conducted, that increasing the amount of data collected through NAPLAN will not benefit the wellbeing of students. The high stakes, point in time nature of NAPLAN means that a wellbeing survey conducted at a time of increased anxiety will not provide a reliable measure of student wellbeing and will create additional anxiety for students and greater burdens for teachers trying to navigate their students through what is already often a fraught process.

¹⁹ Australian Education Union, *State of Our Schools*, Survey Results 2023

In addition, the AEU Northern Territory Branch has indicated that in remote contexts, due to frustration with the testing procedure and often low attendance during NAPLAN week student wellbeing surveys are not representative. It is often the students who are not attending - whether in NAPLAN week or at any time - about whom teachers have the most wellbeing concerns, and these would be missed by a survey.

In Queensland, the education department has, for over a decade, conducted a regular School Opinion Survey that is able to be completed by teachers, parents and students. Teachers have consistently told the Queensland Teachers' Union Branch of the AEU that this survey provides little insight or benefit to student's wellbeing and furthermore, that it creates a potential risk to students' wellbeing as its operation sometimes takes precedence over the resourcing of positive interventions that could have an impact.

The AEU asserts that teachers and school leaders are already well informed about their students' wellbeing and are a better source of this data, especially for younger students and those in remote contexts. It is essential that school staff are provided the time to consider the wellbeing of their students and have access to the support services needed when concerns are identified.

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

As confirmed by this Review's survey of teachers, nearly all teachers and leaders see supporting student wellbeing as important for their role.²⁰ However, school staff are often required through necessity to take on huge additional student wellbeing and mental health burdens beyond their training and qualifications. Inquiries to AEU Branches and Associated Bodies have revealed that school staff are often required to undertake the following tasks:

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

These demands cause considerable health mental impacts for educators who find themselves undertaking mental health crisis work and de facto social work with no training or support.

²⁰ Review Expert Panel, *Initial Consultation Survey undertaken by the Social Research Centre on behalf of the Expert Panel for the Review to Inform a Better and Fairer Education System – May-June 2023*.

Teachers can sustain serious psychological injury because of this unsafe work, and some leave the profession, which compounds the issues of staffing shortages. For example, in NSW members report unacceptably long waiting lists for students to see their school counsellor and there are substantial numbers of school counsellor positions vacant, particularly in the rural and regional areas. This means that counselling has now become crisis management. Instead of being able to provide proactive, ongoing support to students as soon as problems emerge, counsellors are running from crisis to crisis. The addressing of shortages of school counsellors is an absolute priority for improving student wellbeing and mental health.

The State School Teacher's Union of Western Australia Branch of the AEU reports that the loss of system support, through regional offices, means there is almost no capacity for schools to properly support at risk students. Family liaison officers, who played a vital role in ensuring student attendance, are no longer deployed in regional WA, and The School Psychology Service (SPS) is currently operating at a ratio of one school psychologist to 1,500 students. Waiting times for students in need sometimes extend to months, with teachers having to do the best they can in the meantime with minimal or no support. Some regional schools in WA report waiting times of up to 2.5 years.

There are and should be limits to what teachers are required to do to support students. The next NSRA must ensure that these limits are maintained and that additional resource is available to ensure they are not breached. This requires strict adherence to the ratios outlined at question 10, above.

- 13. What can be done to establish stronger partnerships between schools, Local Health Networks and Primary Health Networks?**
&
14. 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?

Co-location and greater co-ordination of services and schools would improve access, engagement, integration and increase school workforce productivity. Coordination between early childhood education, schools, and health and family services must be developed and supported to provide a seamless continuum of education and care from birth through to primary school and beyond. Ideally, families should have access to a wide range of services in a single location such as long daycare, preschool, early intervention, schooling and outside school hours care.

Co-location is being increasingly recognised as an optimal way of structuring Early Childhood Education Services, and the expansion of the model to schools warrants investigation and consideration within the next NSRA.

Every new public primary school should be built with a co-located public preschool, and significant additional public preschools should be built at identified existing public schools. This would be part of delivering universal access to preschool for children in the year before school. To achieve this universal access, governments must commit to the expansion of public preschool education, ensure that public preschools are co-located with public primary schools, and make the necessary investments in the infrastructure and additional staff required to accommodate the needs of cohorts of public preschool students and staff.

The expanded provision of public preschooling must also include needs-based funding and support for children with disability. Such considerations should include, and not be limited to, establishing additional early intervention (prior to school entry) units and support classes and the involvement of other government agencies such as health. Early intervention units should be co-located with public primary schools and allied health services. This would provide specialised support for young children who have a disability or learning support needs, and for their families. Young children with a disability or learning support needs should have access to individualised learning programs aligned to preschool programs. Early intervention units and support classes would improve students' timely and ongoing access to additional support mechanisms and early intervention strategies at their point of need, such as early intervention and transition support teachers and appropriate health interventions and therapy sessions, and support schools and education departments to more efficiently liaise and work with other agencies and services such as government health departments and services.

Children's Centres and Children and Family Centres in South Australia take the approach of bringing together education, health, community development and family services in a single location. Services on offer include playgroups, long daycare, preschool, parenting programs, health and allied health, and family practitioners. It makes sense that where children's services are co-located with schools there are opportunities to access support within the school such as counsellors and psychologists.

A national picture of programs and supports currently offered by individual states and territories for children identified as disadvantaged or with special needs must be developed, with a view to identifying gaps and under-resourcing as well as exemplary models which have the potential to deliver quality education. This presents a partnership opportunity for the commonwealth with states and territories to expand and build in schools upon already successful programs that operate between early childhood education centres and primary care services.

Teachers need timely access to primary and allied health professionals to help assess children and implement effective early intervention.

The AEU recommends that the next NSRA encourage increased integration between schools and allied health professionals to ensure effective early intervention and increase allied health support in schools to ensure rapid response to student needs.

Our current and future teachers

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

The OECD report *Effective Teacher Policies: Insights from PISA* states unequivocally that the “quality of an education system depends on the quality of its teachers; but the quality of teachers cannot exceed the quality of the policies that shape their work environment in school and that guide their selection, recruitment and development.”²¹

The AEU 2023 *State of our Schools* survey shows that new educators are not enthusiastic about how their Initial Teacher Education (ITE) prepared them for teaching, and many did not receive assistance with the transition into teaching. On average they rate their ITE experience as 6 out of 10 and more than a third (35%) of new educators said that their ITE was not helpful in preparing them to manage classroom activities - in under resourced schools this increased to 41%.

Only one third of teachers in their first three years of teaching intend to continue teaching in public schools until retirement. Very tellingly, only 5% of new educators said that they had received any follow up from their ITE institution at the start of their career. This survey data confirms the TALIS 2018 results which show that across nearly all elements new educators in Australia feel less prepared to teach than their peers in other OECD countries, despite a higher percentage having covered each element during their ITE.

Increased support for pre-service teachers is sorely needed, and this must include ongoing observation of, interaction with, and advice from experienced teachers, who are provided with additional release time to undertake this important work, during practicums as well as a significant increase in support from ITE providers. Additionally, extended practicums must include an adequate level of in class supervision by a properly resourced mentor.

Financial assistance to allow ITE students to undertake further or additional practicum during their studies is necessary, including support with living expenses and the maintenance of student lodgings. To assist ITE students with meeting costs of undertaking study, financial support including fee-free courses, generous scholarships and bursaries, and the guarantee of permanent employment after graduation should be available. Increasing levels of permanent employment for teachers and maintaining staffing systems which allow for teachers to transfer between schools, including on the basis of service, would assist in encouraging new teachers to work in hard-to-staff areas such as regional and remote locations.

It would be appropriate to provide targeted and increased support to ITE students who have additional needs, competing commitments, cost of living pressures, an inability to work during practicums, and to those who are studying in areas of workforce need.²²

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

²² AEU Submission to the Teacher Education Expert Panel Discussion Paper (5 May 2023), p.10.

Case Study: Support for New Educators in Tasmania

Early career teachers receive an instructional load reduction of 90 per cent of equivalent teaching time in their first year and 95 per cent in their second year. Called the Beginning Teacher Time Release (BeTTR) program, the purpose is to facilitate access for new educators to activities such as meeting with mentors, attending professional learning, collaboration and networking, meeting with curriculum officers and additional time for lesson planning.

Also, teachers who agree to support early career teachers as mentors have a reduction in their instructional load by one hour per week. Research shows that beginning teachers highly value mentoring support and that it is critically important to equip them with the emotional and practical skills that are needed to build resilience.

Early career teacher ██████████, from ██████████ School, says that support and mentoring is vital and has helped keep her in the profession. “I’ve been really lucky in my career in that I’ve had great support and amazing mentors and that is so important when you’re starting out as a teacher because everything is new and you’re starting everything from scratch,” said ██████████.

“Quality mentoring for early career teachers is absolutely pivotal because it’s very easy to become overwhelmed and we see a lot of young teachers leaving the profession in the first five years of their career.”

“I have always been proactive in seeking support from experienced educators, but I used to feel a little bit guilty because all teachers are extremely time poor, and I knew I was taking time away from my mentor. It’s so important that we have quality mentoring programs and that schools are staffed to enable the mentors themselves to have the time they need to support early career teachers.”

Case study: Support for New Educators in WA

The State School Teachers' Union of Western Australia has, through negotiations, secured employment conditions specifically relating to graduate teachers. Of particular note, are the Graduate Teacher Professional Learning Program (GTPLP) and the Graduate Teacher Release Time.

The GTPLP comprises of targeted professional learning modules, access to the In-Class Coaching program, school induction processes, funding support. This program assists graduate teachers to:

Build their capacity and skills to be effective teachers

Enhance their professional practice

Gain a deeper understanding of the Australia Professional Standards for Teachers

Transfer learning from the program to their teaching practice.

The In-Class Coaching Program (ICCP) provides graduate teachers with:

- 1. Confidential, non-judgmental, external support*
- 2. Substantial impact on professional growth*
- 3. Increased empowerment and autonomy in classroom decision making*
- 4. Focused self-reflection on teaching practice.*

This support is provided by trained teacher coaches over a semester through:

- 1. Professional conversations and classroom visits*
- 2. Individualized goal setting and solutions focused coaching*
- 3. Ongoing data collection and analysis related to teaching practice to support evidence collection for portfolio development and application writing*
- 4. Use of the Australia Professional Standards for Teachers as a framework for reflection*
- 5. Transference of new professional learning to classroom practice.*

ICCP is offered on an opt in basis and is fully funded by the Department of Education. This Program is very well received by graduate teachers and take up rates in this program are very high.

In the first year of teaching, additional non-contact time of 5% of FTE per week is provided to each graduate teacher. While it is expected that this time allocation is available to graduates on a regular basis, it can be accumulated over no more than a term to accommodate different contexts and needs

This release time can be used for purposes duties other than teaching and to provide release for participation in professional learning activities.

Case study: The Morayfield Cluster Teacher Education Centre of Excellence (MTECE) program in Queensland

Investment in early career teachers with the support and skills to thrive in the profession is essential for retention. The Morayfield Cluster Teacher Education Centre of Excellence (MTECE) program, funded initially through national partnerships, operated from 2011-2019 and provided additional experience, mentoring and professional development to selected final year preservice teachers, bonded to permanent employment in Queensland state schools in rural/remote or low SES communities.

MTECE graduates were provided targeted training in understanding poverty and trauma and were classroom ready and confident for success with poverty and trauma informed practices as part of a full teaching toolkit. Mentoring was provided into their early teaching career. As a result, MTECE graduates had a significantly higher retention rate in the profession than other early career teachers. However funding only extended to selected applicants, but if funded as attraction measure for all interested preservice teachers with offer/bond of permanent employment and additional skills for a successful career, or release time and mentoring for early career teachers, this would improve attraction and retention within the profession as well as significantly benefit students from complex backgrounds and communities.

Retention rates for the MTECE and extraordinarily high – five years on from the 2018 program employment data shows that the entire 2108 cohort are still teaching in Queensland state schools.

The Partners for Success Recruitment, Selection and Induction Strategy in remote Queensland schools

The strategy was designed to attract, select, support and retain quality teachers from a range of teaching backgrounds who demonstrated expertise, enthusiasm and the capability to teach in dynamic cultural environments. It was developed in negotiation between Queensland Department of Education and the Queensland Teachers' Union. Following a successful trial period, the process was embedded and successfully operated as a significant strategy from 2005-2011.

The strategy focused on thirty-nine Identified Indigenous schools located within Aboriginal and Torres Strait Islander communities, many of which are situated in the most remote locations in the state and focused on:

- Targeted application and selection process
- Targeted recruitment focusing on experienced teachers currently in urban areas including Professional development and leadership development opportunities
- Targeted recruitment of beginning and pre-service teachers in pre-service teachers including supported internships and practicums in remote Indigenous schools and pre-appointment graduate teacher workshops and preparatory workshops.
- Comprehensive phased pre-appointment induction program
- Tailored professional development, support and off-site delivery respite
- Specific Indigenous school leadership recruitment and succession program

The Strategy utilised highly personalised implementation of the recruitment, selection and induction processes. A formal panel of current principals and education specialists from Aboriginal and Torres Strait Islander school communities processed and assessed applications.

During the time the Strategy was active teacher retention in remote schools increased significantly from 67% in 2000 to 77% in 2007, with the average length of service for teachers in remote areas increasing from 1.9 years in 1999 to 3.3 years in 2007. This is a full 1.3 years beyond the minimum period of service required of 2 years.

Queensland Teachers Union school leaders and members have noted that over the ten years since the operation of the Partners for Success Recruitment Strategy, principals are still calling for a contemporised and remodelled process to support serious current challenges in the recruitment, selection and retention of teaching staff to remote Aboriginal and Torres Strait Islander school communities.

Australia needs a systemic and robust approach to preparing teachers for a successful career in the classroom and a more rigorous threshold to ensure that every teacher entering the profession is ready to teach. The top-performing countries in international assessments spend substantially more time and resources than Australia does to ensure that standards, programs and entry assessments are aligned and coherent.

Australia has a long way to go in presenting teaching as an attractive profession. Programme for International Student Assessment (PISA) data shows that Australia is 27th of 34 OECD countries in the gap between the percentages of high achieving 15 year olds who expect to be working as a teacher at age 30 and those who expect to pursue a different career, with a 28 percentage point gap between the two.²³

Attracting high performing school leavers to teaching requires reward and respect for the profession. The AEU agrees with the findings of the Commonwealth Behavioural Economics Team cited in the Review's Consultation Paper, that "the perceived status of teachers and unfavourable working conditions were identified as deterrents for school leavers to enter the profession. They also found that the perception of low salary was a key deterrent for young high achievers to enter the profession."

If this NSRA Review seeks to ensure that there are enough teachers available to meet the rapid increases in forthcoming demand and ameliorate the decline in high achieving and highly motivated students who want to enter ITE and pursue teaching careers, then it is essential that the primary drivers of this decline in the attractiveness of teaching as a profession are properly analysed and comprehensively addressed.²⁴

To attract high quality candidates into teaching it is necessary to invest in appropriate salary structures that reward teachers' experience and expertise and to provide teachers with the time and space to do their jobs. There is an urgent need for systemic workforce planning and improved workforce attraction and retention strategies. This does not align with the measures detailed in the National Teacher Workforce Action Plan to attract new teachers are primarily focused on a marketing campaign and fast track programs designed to lure mid-career professionals for often short-term engagements as teachers.

Continued attempts to fast track mid-career professionals through ITE amount to an admission of policy failure and neglect by government – teacher shortages have been ignored for over a decade. Evidence from the implementation of such programs that aim to fast track mid-career professionals into teaching such as Teach for Australia demonstrates that they undermine quality and retention and wherever they have been implemented, in Australia, in the US and in the UK, such programs have been clearly demonstrated not to be effective in preparing mid or late career ITE students to enter the classroom.

²³ OECD (2018), *Effective Teacher Policies: Insights from PISA*, PISA, OECD Publishing, Paris, https://doi.org/10.1787/9789264301603-en_p.20

²⁴ *The Review to Inform a Better and Fairer Education System Consultation Paper*, p.30.

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

The Quality Initial Teacher Education Review found that the minimum salary threshold most likely to make teaching appealing to young high achievers is \$90,000 in first year and \$130,000 for top-of-scale pay.²⁵ The only jurisdiction that is set to achieve this based on existing agreements is the ACT. While the AEU is proud to win improved salaries and conditions for members, it should not be up to a union alone to ensure the basic conditions on which the future of quality public education is predicated.

Numerous international studies from the 1970s to the current decade have consistently shown that higher teacher salaries relative to those of other comparable professionals increase the likelihood of highly performing secondary students becoming teachers, and reduce long term rates of attrition. Chevalier, Dolton & McIntosh (2006) found that the number of high quality secondary school graduates who enter teaching rises and falls in direct correlation with teachers' salaries.²⁶

As pointed out by Ingvarson et al. in their submission to the Teachers Education Ministerial Advisory Group (TEMAG) in 2014, there is also a clear correlation between a country's investment in teachers' salaries and the performance of its students in PISA tests.²⁷

Furthermore, whilst early career teachers are remunerated at similar levels to those in other graduate positions, there is a noticeable lag in teachers' pay progression over time which leads to shortages, attrition and difficulties in recruitment, particularly for teachers in Science, Technology, and Engineering and Mathematics (STEM) subjects.

Although pay is not the sole determining factor in the attractiveness or otherwise of any profession, it nonetheless is a significant consideration, and is an area where in Australia teaching has failed to keep pace with other professional occupations requiring similar levels of qualification and skill. The career and salary progression structure for teachers in most states and territories creates a severe disincentive for students to consider a career in

²⁵ Behavioural Economics Team of the Australian Government, survey cited in *Report of the Quality Initial Teacher Education Review*, 2022, p. 11.

²⁶ Chevalier, A., Dolton, P. & McIntosh, S. (2007) *Recruiting and retaining teachers in the UK. An analysis of graduate occupational choice from the 1960s to the 1990s*. *Economica*, 74(293), pp. 71

²⁷ Ingvarson, L., Reid, K., Buckley, S., Kleinhenz, E., Masters, G., Rowley, G. (2014). *Best Practice Teacher Education Programs and Australia's Own Programs*. Canberra: Department of Education, p.47.

teaching. The relatively narrow interval between graduate salaries and those of the most experienced teachers has the effect of forcing a decline in salary, relative to other professions, as experience and expertise increases. This is in stark contrast to evidence from a study of teachers' salaries in 30 countries that shows that the salaries of experienced teachers relative to other comparable professions distinguishes countries with high levels of student achievement from others.

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

This response is included the body of the submission.

In the 2023 State of Our Schools survey teachers were asked “In your opinion, do schools as a whole currently have difficulty in retaining teachers in the profession?” The results demonstrate the scale of the attrition problem in public schools, and the extent to which attrition has increased in recent years.

- 95% of teachers say that schools have trouble retaining teachers in the profession. This has increased markedly from 68% in 2020. When teachers were asked what could turn reduce attrition - reduced workloads and improved salaries for all teachers were the most cited changes that would help to retain teachers.
- Only 19% of current teachers were sure that they would continue teaching until retirement. In 2015, 44% planned to teach for their entire working life.
- 31% said that they have plans to leave teaching prior to retirement – this has more than doubled from 14% in the 2020 survey. Another 41% said that they “possibly” planned to leave

When teachers who plan to leave the profession were asked to choose the three most important factors in their decision to leave, 64% chose workload, 40% chose the amount of administration and compliance work required and 34% chose salaries as the main reasons for wanting to leave the profession.

When asked about pre-retirement resignations at their school 43% of principals said that they had experienced an increase in the last year, with only 21% planning to continue working in education in any capacity and only 4% of teachers resigning to take up a position at another public school and 32% planning to take a break from employment all together.²⁸

Workload is the major issue – and there is a huge and consistent body of evidence showing that unrelentingly high workloads are driving teachers away.

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

²⁸ Australian Education Union, *Op. cit*, 2023

In NSW, a survey of over 18,000 teachers found that the average full-time teacher is working 55 hours per week during term time, with over 43 hours per week at school on average and a further 11 hours per week at home.²⁹ In Victoria, a 2016 study of classroom teachers reported working an average of 53 hours per week, and leading teachers reported working an average of 55 hours per week. These results have since been validated by another 2021 survey of over 10,000 Teachers in Victoria which again found that on average they work 53 hours per week.³⁰ Most recently, AITSL’s latest Australian Teacher Workforce Data has again confirmed that teachers work an average of 53 hours per week.³¹

Average hours worked per week in 2022



The consistency of these results across states and across teachers of all levels of experience in both primary and secondary schools, clearly indicates that work in schools simply is too great in volume and intensity to be undertaken in the time available at school, and it is no surprise that less than one third of teachers say that they “have the time to do my job well.”³²

In addition to excessive working hours, a large majority of teachers report significant workload intensification and sustainability concerns. The chart below shows the findings two national surveys of teachers conducted by Monash University in 2019 and 2022. Over the last three years the proportion of teachers who say their workload is not manageable has increased from 75% in 2019 to 86% in 2022, and the percentage who strongly disagreed with the proposition that their workload is manageable increased to 40% from 28% in 2019.³³

²⁹ McGrath- Champ, S., Wilson, R., Stacey, M. & Fitzgerald, S., (2018) Understanding Teaching in Schools, the Foundation for Teaching and Learning: 2018 Report to the NSW Teachers Federation, Sydney, p. 14

³⁰ Australian Education Union Victorian Branch, *State of our School Survey Results: Survey of Victorian Public School Staff*, conducted Feb-March 2021, retrieved from

<https://www.aevic.asn.au/sites/default/files/vgsa/210430%20State%20of%20our%20SchoolsFINAL.pdf? t=1619736721>

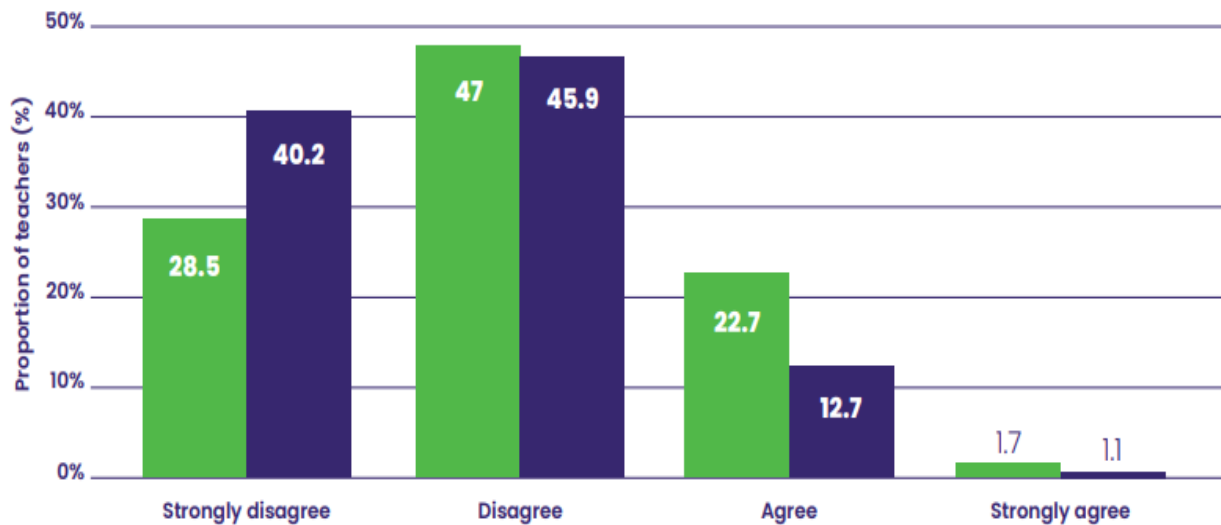
³¹ AITSL, [Australian Teacher Workforce Data: Key Metrics Dashboard](#), 2023

³² NSW People Matter Employee Survey 2020, retrieved from <https://www.psc.nsw.gov.au/reports-and-data/people-matter-employee-survey/pmes-2020>

³³ Longmuir, F., Gallo Cordoba, B., Phillips, M., Allen, K.A. & Moharami, M. *Australian Teachers’*

An increasing proportion of teachers say their workload is unmanageable

2019 2022



In the 2021 Victorian workload survey, only 14% of teachers said that their workload is often or nearly always manageable, and only 15% felt that they often or nearly always had a good balance between home and work. 84% of teachers indicated that their workload at some stage has had a negative effect on their home life, and most alarmingly, 49% teachers in all schools indicated that their workload often or nearly always adversely affected their health.

The workload burden on teachers in Australia is immense, and the general acceptance of teachers working up to the equivalent of two additional days per week for sustained periods of time and indeed often on a permanent basis, and being swamped with additional tasks only tangentially related to their practice, is one of the factors most frequently cited by teachers as the reason for burn out and attrition. A teacher from the NSW Teachers Federation workload study describes the experience:

“I am currently on leave from the Head Teacher position and am working as a classroom teacher. This decision was due to excessive work hours, averaging 80+ hours per week in term and 50+ hours in "holidays" as a Head Teacher for 6 years. The stress of this unsustainable workload left me physically exhausted and mentally drained. Total burn out. Having been working as a classroom teacher for a year, I still feel unable to resume my duties, although I am gradually recovering. I felt there was no real support for me in [the] couple of years building up to this decision. I was told to re-prioritise, but when I did, I was continually instructed to do things I had prioritised at a low level”³⁴

Perceptions of their Work in 2022, Monash University, 2022), p. 24, retrieved from <https://doi.org/10.26180/21212891>

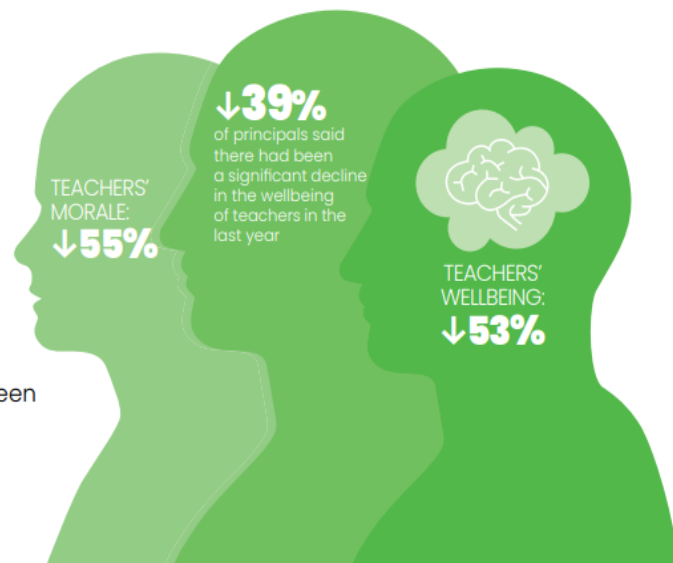
³⁴ McGrath-Champ, S. et al., Op.cit., p 35

Funding inequity has a profound impact on staff wellbeing and morale

Chronic underfunding, teacher shortages and the unequal distribution of resources in schools are impacting on teachers' workloads, morale and wellbeing.

In the 2023 State of Our Schools survey, almost 40% of principals said there had been a significant decline in the wellbeing and morale of teachers in the last year.

A majority of teachers also reported significant declines in teacher wellbeing (53%) and morale (55%).



As recently noted by Professor John Buchanan: “It is possible we are degrading the environment and habitat of all teachers, putting in jeopardy their capacity to survive.”³⁵

There are numerous policy levers that Commonwealth, State and Territory Governments have available to reduce teacher working hours and workload intensity and to curb the current unacceptably high levels of teachers being driven out of the workforce. Both levels of government have the opportunity in the next NSRA to ensure that workload relief measures are put in place and guaranteed through a commitment to funding to public schools to 100% of the SRS linked to workload reduction. This would immediately enable schools to hire many more thousands of additional teachers and to reduce class sizes and individual workloads, for example through the provision of additional release time to teachers. State and Territory governments are able to improve teachers' pay and career progression through their employment agreements.

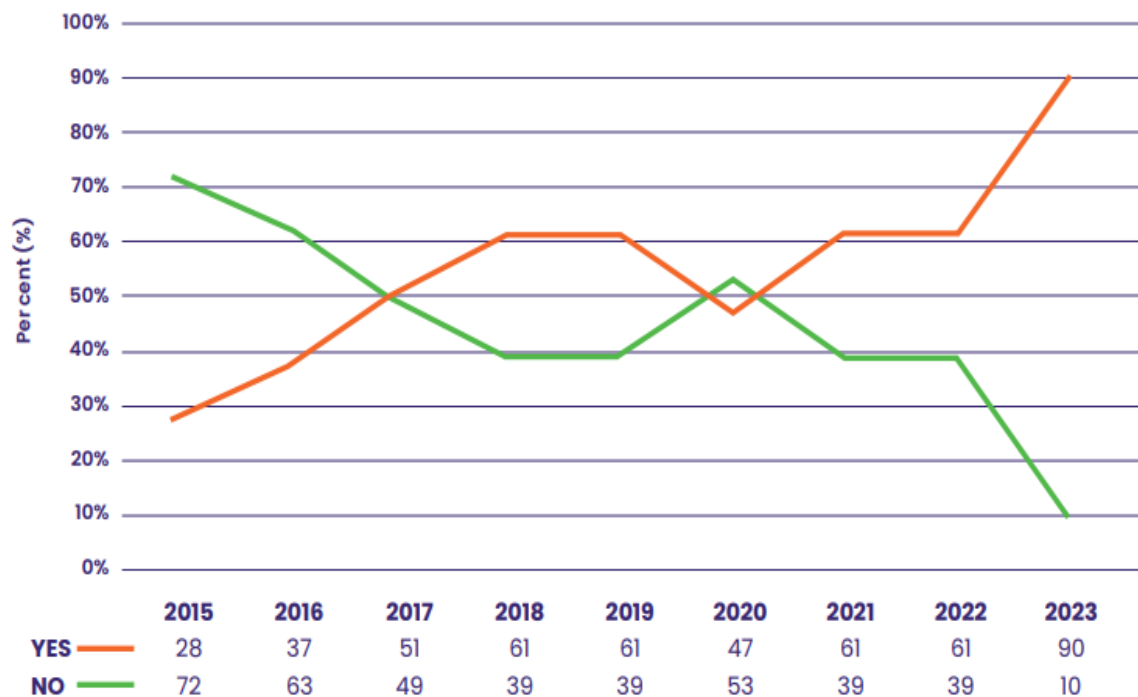
The next NSRA could also reduce attrition by reducing the demands of compliance and administration work that is required of teachers. It could include commitments to decouple the NSRA measurement framework and performance indicators from NAPLAN and ensure that no new initiatives in relation to assessment, reporting, evaluation and accountability are imposed on teachers and principals, and that any new initiatives are not introduced without extensive prior consultation and negotiation with the teaching profession via its union, the AEU.

³⁵ Buchanan, J. (2020). Challenging the deprofessionalisation of teaching and teachers: Claiming and acclaiming the profession. Springer.

17. What change(s) would support qualified teachers to return to the profession?
&
18. What additional reforms are needed to ensure that the schools most in need can support and retain highly effective teachers?

This response is included the body of the submission.

Principals - Has your school had teacher shortages in the last year?



The chart above, from the 2023 State of our Schools survey, shows just how acute the national teacher shortage has become, particularly since 2020. Supporting qualified teachers who have left the classroom to return and helping those who are considering leaving to remain could go some way towards alleviating the crisis, however significant and permanent changes to the working hours and workload intensity and improved salary structures for all teachers would be required to encourage qualified teachers who have left the profession to return to the classroom.

Teacher salaries in Australia are considerably flatter throughout their career than in most comparator countries. *Education at a Glance: OECD Indicators 2022* shows that whilst the OECD average salary at the top of the salary scale is 1.6 times the graduate salary in Australia, the average is 1.4 times starting salary.³⁶ This means that unlike most OECD countries where experienced teachers continue to be rewarded through pay progression

³⁶ Retrieved from OECD Statistics Education and Training

well into their careers, in Australia a teacher can spend most (and potentially up to three quarters) of their career at the top of the salary scale without access to pay progression.

Over time, and over the last two decades in particular, the complexity of teachers' work has increased significantly. The frequency of practise changes to comply with policy changes, increased administrative and data requirements and increasing numbers of students requiring additional support have all increased whilst salaries have not. The 2021 independent inquiry *Valuing the Teaching Profession* made the following observations on the increased challenge inherent to teaching in recent decades and found that increased complexity has not been met by improvements to pay:

“The Panel is of the view the evidence from teachers and experts is persuasive in arguing that ... there has been a markedly significant change in teachers' work. All aspects of the work of teachers has grown in volume and complexity.”³⁷

“At the same time as these increases in work, complexity and responsibility there has been a decline in the relative position of teacher salaries alongside that of other professions and a reduced attractiveness of public sector teaching as a career; this being a contradiction that needs urgent attention by way of a significant upgrade in teacher salaries and an improvement in career options.”³⁸

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

“Taken with the fragile and inadequate staffing mechanisms currently in place, the salary levels in place and projected for the next three to five years are dangerous for the public standing of the profession, and for the quality of education available to the students of the state's [NSW] public schools.”³⁹

All teachers should have the opportunity for salary progression throughout their careers. Incentives or the promise of a special status and elevated pay for a select minority will not address the issue.

The next NSRA must acknowledge that teacher's work, and in particular the work of teachers in public schools, is increasingly complex, and in recognition of this it must encourage state and territory governments to extend current salary scales to allow *all* teachers access to salary progression throughout the careers whilst remaining in the classroom, whilst putting in place measures to assure teachers that have left that the workload concerns that drove them out will be addressed thoroughly and permanently.

A number of time relief and workload initiatives have been implemented in NSW in recent months. While helpful, they constitute only an important first step and much more will be required to comprehensively address teacher workloads. In addition to removing unnecessary administrative requirements and genuinely listening to teachers' views about the workload challenges and what work needs to be simplified and/or removed, new and

³⁷ Gallop, G., Kavanagh, T. & Lee, P., *Valuing the Teaching Profession: An Independent Inquiry*, 2021, p.126

³⁸ *Ibid.* p.9.

³⁹ *Ibid.* p.133.

increased funding to provide additional release time to teachers on an ongoing permanent basis and employ additional administration and support staff will be essential.

An instructive case study is the rollout of new curriculum changes in NSW. To support ongoing curriculum and syllabus development and implementation, in addition to specialist support that is structurally organised and embedded across the public education system, namely an expanded non-school based teaching workforce, it is essential that significant additional release time is provided.

Teachers need time to do their jobs well and achieve positive student outcomes. Significant increases in overall funding will be required to enable permanent and substantial increases in release time for teachers, to enable them to plan for and implement effective teaching and learning strategies aligned with the curriculum, and juggle the many existing demands and growing complexities of their work.

These changes can only be achieved through the full funding of the SRS and all student based loadings.

19. What can be done to attract a diverse group of people into the teaching profession to ensure it looks like the broader community?

Workforce planning needs to prioritise a diverse workforce that is reflective of the community, and that supports entry to the profession whilst upholding entry and qualifications standards. Universities have an important role to play in developing strategies that promote and support diversity in the ITE student cohort. It is vital that universities provide adequate support services (both academic and social) for all student groups and provide incentives that encourage a more diverse group of students to undertake ITE.

Targeted recruitment to increase diversity among teachers could be a focus of the next NSRA, and incentives and employment assurances could be developed by governments to encourage a wider range of people to consider teaching. These incentives should include measures to enhance and support pre service practicums including bursaries, scholarships, or discounted HECS-HELP contributions for graduates from in demand subjects or underrepresented cohorts. Permanent ongoing employment for insecurely employed teachers who undertake additional study in areas of shortage or who are from underrepresented cohorts and display motivation, aptitude, capacity and commitment to teaching should also be considered.

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

Aboriginal and Torres Strait Islander students are under-represented in the ITE student cohort and have lower completion rates than ITE students generally (AITSL, 2020). Evidence from previous successful initiatives to recruit and train First Nations teachers provides a clear path forward. The More Aboriginal and Torres Strait Islander Teachers Initiative (MATSITI) was a national project funded by the then Federal Department of

Education, Employment and Workplace Relations (DEEWR) and managed by the University of South Australia. The overarching objectives of the MATSITI project were to increase:

- the number of Aboriginal and Torres Strait Islander people in teaching positions in schools;
- the capacity of Aboriginal and Torres Strait Islander teachers; and
- the retention of Aboriginal and Torres Strait Islander teachers in teaching positions in schools.

The project commenced in 2011, and despite recommendations to support its continuation, based on robust research and evidence of positive outcomes, the project was finalised in 2016, with opportunities for its extension lost in changes to the machinery of government in Aboriginal and Torres Strait Islander affairs, following the election of the Abbott government in 2014 (Rose, 2018).

An independent evaluation of the initiative (Johnson, et al., 2016) found that project partners intensified their commitment to achieving MATSITI's aims through their formal participation in the project and further, that partners and stakeholders raised their awareness of the "direct relationship between the presence of Aboriginal and Torres Strait Islander teachers in schools and improvements in educational outcomes for Aboriginal and Torres Strait Islander students" (p. 6). The project resulted in a 16.5% increase in the number of Aboriginal and Torres Strait Islander teachers between 2012 and 2015, "due to recruitment and improved levels of identification" (Ibid.)

To increase the number of Aboriginal and Torres Strait Islander students undertaking ITE, the next NSRA must include a comprehensive workforce strategy of the scale of MATSITI and which builds on the outcomes of that program, needs to be developed and implemented. The overarching objectives of the strategy must be to increase: the number, capacity and retention of Aboriginal and Torres Strait Islander people in teaching positions in schools. This is critical to develop leaders and provide appropriate professional development that leads in a meaningful and appropriate way to a full qualification.

To increase the attraction of First Nations people to teaching and increase retention the AEU recommends the following:

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

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

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

The next NSRA should also ensure that governments instil cultural safety for Aboriginal and Torres Strait Islander teachers and students through ensuring authentic training and professional development for all teachers. This should include the decolonization of pedagogy and recognizing through reflective practice their own bias based on deficit discourse which in turn encourages individual and collective environment of low expectations of Aboriginal and Torres Strait Islander students. This will then create a culturally safe and supportive environment for Aboriginal and Torres Strait Islander Students. Training for teachers and staff on how First Nations teachers and students navigate the cultural interface daily and how to use this to their advantage in the classroom.

21. What reforms could enable the existing teacher workforce to be deployed more effectively?

Teaching quality and high standards are best supported through collaborative work and professional learning practices. This is best achieved where there is consistency in the standards and professional learning expectations across the system/workplace, including qualifications. Teachers will only remain in the profession if they are adequately prepared for and supported through entry to a highly complex profession. Once inducted into the profession, appropriate remuneration, professional autonomy and respect, and support through ongoing professional learning are necessary to maintain high quality teaching. Teacher registration authorities will be more successful in driving this practice, in line with the Standards, where their operation is grounded in the profession itself. For example, teacher representation on boards, or in policy development, is imperative in ensuring the Standards become and/or remain a core part of teachers' work.

Policymakers must also invest in measures that enhance collaboration and information sharing among teachers. In many schools, such social capital is assumed to be an unaffordable luxury or, worse, a sign of teacher weakness or inefficiency. Yet our research suggests that talking to peers about the complex task of instructing students is an integral part of every teacher's job and results in rising student achievement.⁴⁰

⁴⁰ Leana, C.R., *The Missing Link in School Reform*, Stanford Social Innovation Review, Fall 2011, p. 35

High quality professional development programs are required to equip all teachers with the support required to progress through the professional standards, and governments have a responsibility to ensure that schools in disadvantaged communities receive a greater level of support and investment to ensure that all schools can attract highly qualified and skilled teachers.

High quality professional development is best delivered by qualified, experienced teachers employed from within the public system, ie non-school based teachers. There is a need to urgently expand the numbers of such roles. These teachers would support whole-school programs and teacher professional learning. Seconded from the classroom and with detailed professional knowledge of individual, student and public system contexts, these teachers are best placed to support their colleagues to deliver positive outcomes for diverse student cohorts aligned with the curriculum. They facilitate the vital connections that define public education as a state-wide school system, including through the delivery of high-quality professional development. Recent examinations of teachers' work, such as the reports *Understanding Work in Schools: The Foundation for Teaching and Learning (2018)* and *Valuing the Teaching Profession: An Independent Inquiry (2021)*, have demonstrated that public schools are urgently in need of improved system support delivered by an expanded non-school based teaching service.

There are too many examples of inappropriate, ineffective professional development. Some of this stems from external providers looking at this activity as primarily a means to generate income, offering pre-packaged, one-size-fits-all, one-and-done, commercial programs, often via an on-line platform. Universities have an opportunity to work with systems and schools to develop professional development that:

- Is strategic and is based on a coherent, research-based vision of effective learning and teaching;
- Addresses the needs and situations of specific schools and teachers;
- Engages with teachers as professionals and is informed by their views;
- Encourages on-going cooperative and mentor-mentee relationships.

Scholarships could also be offered to encourage current teachers to retrain in areas experiencing the most significant shortages such as Mathematics and/or Science.

The AEU identifies a range of core areas central to improving the capacity of this country's education system, to retain experienced teachers in the profession and to attain positive social outcomes in education and society:

- Quality teaching, including: fully qualified teachers; systemic support for teachers; continuous professional development; teachers having control over their profession; student centred teaching; sustainable workload
- Quality learning: including a broad engaging and inclusive curriculum; targeted support for students with additional needs; professional control over student assessment; student centred learning; teaching and learning being at the heart of leadership; needs based funding and fully resourced schools
- Safe and inclusive schools: employers taking systemic responsibility for teaching and learning conditions to ensure safe and inclusive schools; comprehensive strategies and

staffing to ensure student wellbeing; comprehensive strategies and staffing to ensure teacher wellbeing; structured connections with community agencies and programs

- Workforce planning (addressing supply and demand): a workforce that is diverse and reflective of the community; systemic workforce planning; secure employment; attraction and retention strategies; minimum qualification standards for employees
- Effective systemic direction and support: strong systemic support for schools, school leaders, teachers and educational support; employers' responsibility for the provision of high quality professional learning; state and territory registration bodies; substantial and qualified non-school based teaching force to support schools through a head office and associated regional structures.

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

22. How can teacher career pathways, such as master teachers and instructional specialists, be improved to attract and retain teachers? How should this interact with HALT certification and the Australian Professional Standards for Teachers?

As detailed in the response to questions 16 and 17 above, teachers in Australia can spend most (and potentially up to three quarters) of their career at the top of the salary scale without access to pay progression. The only viable solution to the low salaries of teachers which are leading to attraction and retention problems, is to lift the salaries of all teachers.

The AEU has heard anecdotal evidence of many teachers being dissuaded from undertaking the HALT process due to the extensive and time-consuming certification requirements. Further, we have heard of teachers taking months of unpaid leave to prepare their applications. The barriers to HALT certification are clearly demonstrated by the miniscule number of teachers who have been certified - over the last decade 1,054 teachers have been HALT certified⁴¹, representing 0.34% of the 307,041 teachers working in Australian schools in 2022.⁴² . The proposed introduction of instructional leaders and master teachers, which have been proposed to cover only a combined maximum of 9% of the teaching workforce and proposed to require HALT certification, is not a viable strategy for attracting and retaining teachers.⁴³

⁴¹ AITSL, *A snapshot of National certification of Highly Accomplished and Lead Teachers (HALTs) in 2022*, retrieved from: https://www.aitsl.edu.au/docs/default-source/certification/certification-snapshot-june-2022_updated.pdf?sfvrsn=7b18ae3c_2

⁴² ACARA, *Staff Numbers: Key Facts*, retrieved from <https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/staff-numbers#:~:text=In%20Australia%20in%202022%3A,%25%20in%20non%2Dgovernment%20schools.>

⁴³ Goss, P., and Sonnemann, J, *Top Teachers: Sharing expertise to improve teaching*, Grattan Institute, 2020

The flaw in this approach is succinctly described in the American context by Professor Carrie Leana:

*In trying to improve American public schools, educators, policymakers, and philanthropists are overselling the role of the highly skilled individual teacher and undervaluing the benefits that come from teacher collaborations that strengthen skills, competence, and a school's overall social capital.*⁴⁴

Action to improve career pathways and to retain teachers must include concrete steps to expand salary scales and increase remuneration and progression paths for all teachers through industrial agreements and based on the Australian Professional Standards for Teachers. This must include improving career structures and providing a general uplift in salaries for all teachers, so that existing teachers who are not at the top of the pay scale receive increased remuneration, and also so that experienced teachers do not hit a salary ceiling after 9 to 10 years requiring them to engage in an almost impossible and certainly arduous certification process to progress further. The lack of progress is a major driver of mid-career attrition for teachers.

Real action on reward structures for all teachers will drive improvements in recognition and respect for the profession.

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

Teachers consistently tell the AEU that their ability to provide the individual support that students need is held back by a lack of support and the increasing administrative demands on their time. In the 2023 State of Our Schools survey 85% of teachers said that they spend too much of their time on administration duties and 78% said they spend too much time on data entry to ensure compliance.⁴⁵

However, curriculum materials aimed at streamlining teachers' administrative work must be developed in consultation with the profession and must be able to be deployed flexibly by teachers using their professional judgement. Surveys of AEU members find that teachers feel their professional voices are increasingly silenced in discussions on teaching and learning, and that there is no opportunity to influence or contribute to educational policy design. This is coupled with excessive workloads from top-down mandates and increased administrative and data expectations. This is not unique to one jurisdiction, but rather is replicated across all public education systems in Australia.

⁴⁴. Leana, *Op.cit*, p.30

⁴⁵ Australian Education Union, *Op. cit.*

The way that curriculum units were developed in South Australia exemplifies the shortcomings of a top down approach to development and implementation. As described in the 2020 Progress Report:

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

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

The next NSRA must avoid mass standardisation, low-risk pedagogy, and test-based accountability policies, and instead must focus on high confidence in the professionalism of teachers and principals to try new ideas and approaches, and cultivate the development of whole child.

The AEU recommends that the teaching profession is involved at all stages of the development of curriculum materials and that teachers themselves have ownership over the implementation and evaluation to ensure that teachers in the classrooms of public schools have an in-depth understanding of their purpose, their application to student learning, or the correlation between curriculum materials and the work demands placed on them.

24. How should digital technology be used to support education delivery, reduce teacher workload and improve teacher effectiveness? What examples are you aware of?

Governments must provide public schools with the technological capacity to engage students who are vulnerable or experience disadvantage. The impact of a lack of access to technology and internet connectivity on student outcomes for many low SES and remote students has been a significant barrier to progress against the three key NSRA domains of academic achievement, engagement, and skill acquisition throughout the time that the current NSRA has been in force. This lack of access to technology was not a consideration at the time that the current NSRA was signed but must be a key consideration of the next agreement as the gap between students who have adequate

access to technology and those who do not will only become more apparent post pandemic.

The Australian Digital Inclusion Index (ADII) covers three core aspects of inclusion: access, affordability and digital ability which includes enthusiasm, confidence and a sense of control when using the internet, as well as experience, skills and knowledge in internet use. For vulnerable students (and their families and carers), digital inclusion does not happen automatically, even if the students have experience with information and communication technology at school. “Digital Inclusion requires intentional strategies and investments to reduce and eliminate historical, institutional and structural barriers to access and use technology”, according to the US National Digital Inclusion Alliance.⁴⁶

A 2020 report showed that there are approximately 125,000 Australian students who do not have internet access at home (including via mobile devices or games consoles) and that public school students were more than twice as likely as either Catholic or Independent school students to have no internet access at home. Further, there are over one million public school students in the bottom third of family incomes and almost 325,000 public school students in very low income families (just over 80% of the total).⁴⁷

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

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

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

⁴⁶ Thomas, J, Barraket, J, Wilson, CK, Rennie, E, Ewing, S, MacDonald, T, 2019, Measuring Australia’s Digital Divide: The Australian Digital Inclusion Index 2019, RMIT University and Swinburne University of Technology, Melbourne, for Telstra, p. 10

⁴⁷ Preston, B., Digital Inclusion for All Public School Students, Australian Education Union, 2020, p.9

Investment in thorough digital equity audits with a commitment within the next NSRA to act on the findings will enable Australia’s public schools to bridge the technology and connectivity gaps, and the huge equity and achievement gaps that already existed pre COVID-19 and have only increased over the last three and a half years.

The 2023 Global Education Monitoring Report by UNESCO, titled “Technology in Education: A Tool on Whose Terms?” provides a useful starting point as a framework for thinking about the key questions relating to technology in education, including in relation to achieving equity, putting learners and learning outcomes first, and centring the voice of the teaching profession in the use and evaluation of educational technology. It presents the following considerations:

“Is this use of education technology appropriate for the national and local contexts? Education technology should strengthen education systems and align with learning objectives.

Is this use of education technology leaving learners behind? Although technology use can enable access to the curriculum for some students and accelerate some learning outcomes, digitalization of education poses a risk of benefiting already privileged learners and further marginalizing others, thus increasing learning inequality.

Is this use of education technology scalable? There is an overwhelming array of technological products and platforms in education and decisions are often made about them without sufficient evidence of their benefits or their costs.

Does this use of technology support sustainable education futures? Digital technology should not be seen as a short-term project. It should be leveraged to yield benefits on a sustainable basis and not be led by narrow economic concerns and vested interests.”⁴⁸

The report found that “little robust research to demonstrate digital technology inherently added value to education, and that much of the evidence of the efficacy of technology in education was funded by private education companies trying to sell digital learning products. Their growing influence on education policy around the world was “a cause for concern”⁴⁹

It is essential that teachers as professionals have a central role in education technology, exercising their professional judgment as to its usefulness for learning in a variety of contexts.

⁴⁸ UNESCO, Global Education Monitoring Report Summary, Technology in Education: A Tool on Whose Terms? (2023)

⁴⁹ Butler, P. & Farah, H., ‘Put learners first’: Unesco calls for global ban on smartphones in schools, The Guardian, 26/07/2023.

There are opportunities to use digital technology to reduce teacher workload, but the last decade has seen a proliferation of digital platforms introduced to schools, with scant evidence of system-wide intelligibility or interoperability. In any given day, a teacher may need to log into a separate digital platform to enter or view essential student data such as that to do with attendance, assessment, incidents, disability, as well as platforms that manage email, parent communications, lesson delivery, curriculum, and safety incident reporting.

If the next NSRA is to prioritise meaningful reductions in teacher workload, every jurisdiction should undertake a system-wide consolidation of digital platforms, informed by the experiences of AEU members. This is necessary that technology is deployed in service of pedagogy, and not as its driver.

25. Are there benefits for the teaching profession in moving to a national registration system? If so, what are they?

The AEU supports state and territory-based teacher registration alongside the maintenance of the current system of mutual recognition of qualifications and registration. Jurisdiction-specific registration aligns well with and complements the responsibility of states and territories for the provision of school education, delivery of curriculum, the employment of teachers, the regulation of entry into the teaching profession, and the complex and specific legislation operating in each jurisdiction and respects the importance of the close relationships between the teaching profession, the curriculum and the registration process.

The AEU supports respecting the primacy of state and territory-specific requirements. The Australian Professional Standards for Teachers (the Standards) have provided the necessary foundation for the teaching profession. At the core of the professional standing of teachers and registration requirements, alongside the Standards, is the qualification that registered teachers must have. The AEU supports high standards at all levels of the profession, including at point of entry. The union strongly opposes any lowering of the qualification requirements for teacher registration.

The AEU strongly believes a single national teacher registration body is not required. Maintaining the close relationship between the teaching profession, its qualifications, the curriculum and the registration process is vital and this remains state based in Australia.

The Standards themselves underpin the necessary and registration practices and are embedded in the daily work of teachers. The AEU recommends that the next NSRA make explicit reference to the continuing importance of the Standards as the foundation of the teaching profession.

Data collection and reporting can improve our understanding of system performance and help lift student outcomes

**26. What types of data are of most value to you and how accessible are these for you?
&**

27. Is there any data not currently collected and reported on that is vital to understanding education in Australia? Why is this data important?

After not being published between 2014 and 2019, the AEU welcomes that the Australian Government Schools Funding Report has now been reinstated as an annual publication. However it is limited to Commonwealth contributions to school funding. It would be very valuable if the Commonwealth and all jurisdictions published combined data in the level of detail and in the same format provided in the Australian Government Schools Funding Report.

It would also be very valuable if the presentation of data on the ACARA data portal was expanded to allow greater user control and manipulation of variables, in a similar manner to the National Centre for Vocational Education Research Databuilder tool.⁵⁰

It would also be very useful to see collaboration between AITSL and ACARA of datasets and data visualisation tools that combine both the funding, student and staff and achievement data held by ACARA with the Australian Teacher Workforce Survey presented at sector and state level.

28. 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?

This response is included the body of the submission.

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

Resourcing for students with disability is by its very nature intensive. This resourcing must continue to ensure adherence to philosophies of equity, social justice and inclusivity. Despite numerous official reports and State and Commonwealth government reviews over the past two decades identifying serious deficiencies in the resourcing of the education of young Australians with disability, and recent changes to funding and loading arrangements, there has been little progress in this regard. Equity measures in the NSRA must directly address the holistic needs of students with disability.

⁵⁰ National Centre for Vocational Education Research, *DataBuilder*, retrieved from <https://www.ncver.edu.au/research-and-statistics/data/databuilder#tva-students>

The original 2011 *Review of Funding for Schooling* identified disability as one of the key factors of disadvantage affecting school attainment and achievement, and made a key recommendation that resourcing for students with disability be “set according to the level of reasonable educational adjustment required to allow the student to participate in schooling on the same basis as students without disability.”⁵¹ Additional targeted resources were viewed by the review panel as being a basic matter of equity that will keep more students in schools longer and raise skill levels and ultimately lift workforce participation of persons with disability.

However, changes to disability loading categories in recent years have left many students without any support, or with inadequate support. In 2018, over half of all children with disability who attended school accessed support or a special arrangement (58.6% or 167,400). Around one third accessed special tuition (36.8% or 105,200) while around one quarter accessed a counsellor or special support person (23.2% or 66,100). Of those children aged 5-14 years who received support or special arrangements, over one third (36.1% or 60,500) reported that they needed more support than they received.⁵²

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

According to ACARA there were approximately 592,000 students with disability in public schools in Australia in 2021, but at least 186,000 of these students were not in receipt of any loading.⁵³

With nearly 70% of students with disability enrolled in public schools and 86% of all students with disability being educated in mainstream schools⁵⁴ there is an extraordinary contribution made by the teaching profession and education support staff in the education of students with disability, in an under resourced system where workload pressures are immense.

However, reporting of data for students with disability is currently opaque at best. In order to provide students with disability with the best possible opportunity to achieve, engage and acquire skills, the following steps must be taken in into account in the next NSRA and progress on them must be reported transparently:

1. Governments must undertake a review of loading mechanisms for students with disability, informed at every stage by the teaching profession, to determine the real costs of ensuring that all students with disability can access a high-quality education regardless of learning environment so that such loadings are set according to the level

⁵¹ Australian Government, *Op,cit* p. 185

⁵² Australian Bureau of Statistics, *Schools dataset*, 2018

⁵³ ACARA, *National report on Schooling Data Portal*, retrieved from:

<https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/national-report-on-schooling-in-australia-data-portal/school-students-with-disability#SWD>

⁵⁴ Education Council, *2016 Emergent data on students in Australian Schools receiving adjustments for disability*, retrieved from: https://www.education.vic.gov.au/Documents/school/principals/health/ED17-0046%20SCH%20NCCD%20Report%202017_ACC%20%281%29.pdf

of reasonable educational adjustment required to allow the student to participate in schooling on the same basis as students without disability.”⁵⁵

2. Governments must ensure that all education sectors have funding certainty so that they can plan effectively and are not limited in the support they can provide to students with disability in terms of in-class education support personnel, personalised lesson plans, or vital equipment.
3. Governments must ensure that staffing allocations genuinely reflect the appropriate staff/student ratios and provide the funding needed for the development of individual learning plans. This includes the provision of teacher relief to cover classes while teachers develop, implement, monitor and review individual learning plans.
4. Governments must provide an adequate allocation of additional teacher resource and/or education support staff hours to support students with disability.
5. Governments must expand early intervention (prior to school entry) units and support classes and early intervention resource supports, and expand the provision of public preschools co-located with public primary schools and allied health services. This would improve students’ timely and ongoing access to additional support mechanisms and early intervention strategies at their point of need, such as early intervention and transition support teachers and appropriate health interventions and therapy sessions, and support schools and education departments to efficiently liaise and work with other agencies and services such as government health departments and services.

Additionally, and importantly, much greater attention needs to be paid to the impact from the NSRA and its bi-lateral agreements in not meeting the full SRS on all equity measures. AEU analysis of data provided at Senate Estimates shows that failure to fund public schools to 100% of the SRS means that nationally in 2021 the 399,336 students in receipt of a disability loading received \$601.2 million less in disability loadings than they should have that year.

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

A further and significant issue with the resourcing of disability loadings for students in public schools is that many public school teachers and leaders do not have the required resource or time available to them to engage in the repeated assessment and application processes necessary to ensure that their students receive their proper loading. This issue was raised by DESE officials in the 2022/23 Budget Estimates Hearings, and is borne out by the change in the percentage of students in receipt of funded disability loadings by school sector, particularly in recent years.

⁵⁵ Australian Government, *Op,cit* p. 185

From 2015 to 2021 the percentage of students in independent schools who receive the supplementary disability loading has increased from 6.9% to 8.4% and in Catholic schools it has increased from 8.6% to 10.5%. In public schools the increase has been much lower, from 8.3% to 9.0%. Similarly, the percentage of Catholic school student in receipt of the substantial loading has increased from 1.7% to 3.6% and for independent schools it has increased from 2.0% to 2.6%. Over the same time period the percentage of public school students in receipt of the substantial loading has increased only from 3.4% to 3.9%.⁵⁶

These figures suggest that there are significant numbers of students with disability in public schools who are not in receipt of a disability adjustment or are not in receipt of the correct level of adjustment and thus missing out on necessary support. Indeed, the AEU has had numerous reports from AEU Branches and Associated Bodies (in particular from New South Wales, Victoria and Tasmania) that this is the case.

School systems have ultimate authority for ensuring that students with disability have access to the support that they need to participate in education on the same basis as students without disability, but it is the responsibility of governments who administer and fund these systems to ensure that schools have the resources necessary to support students with disability. It is also the responsibility of governments to ensure that schools have enough resources and the capacity to complete the administrative and bureaucratic requirements that the system demands.

The next NSRA must as a priority ensure that all schools systems have the resource and staff capacity required to assess students with disability and attention must be paid to ensuring that all students are able to access the level of support appropriate to their needs. To do this, it must require that all governments publish data on outcomes for students with disability as well as data on the allocation of loadings by level of support.

⁵⁶ ACARA, retrieved in <https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/national-report-on-schooling-in-australia-data-portal/school-students-with-disability>

Case study: Principal [REDACTED] describes the transformative effect additional funds could have at his school:

“Every educator should welcome the shift in philosophical direction to inclusion. This is an important recognition that all students are welcome in public education. However, when education systems shift the cultural direction like this they do not consider a shift in resourcing the model to match the intended change in operational measures.

In saying this, inclusion in Queensland classrooms is about ensuring that, while all students should be supported to maximise their learning outcomes to access the curriculum by minimising their barriers, the support necessary to achieve this aspirational goal means providing a new model to ensure the classroom teacher can integrate the necessary support to maintain a thriving learning environment for all students.

Prior to the strong position on inclusion, students with highly complex needs requiring frequent adjustments throughout the day to support their learning, were supported in a low teacher to student ration Special Education Unit within the school. This meant that these students were not with their peers but had their academic needs heavily scaffolded. Under the inclusion model, students are placed in mainstream classrooms with their peers but the level of support cannot be replicated as a direct result of specialised teachers moving from class to class throughout the day.

With a big shift to inclusion, adding one or two students of highly complex needs back into the mainstream classroom without constant low teacher to student ration support means classroom teachers are struggling to meet the demands of highly complex differential support on their own for most of the time, as the support personnel are now moving from room to room.”

A change in philosophy requires a change in resourcing model.

At [REDACTED], to celebrate the success of inclusion as a model of social learning with mainstream peers, our model of resourcing has changed. Not only has our school resourcing increased, but the resourcing decisions are given to the teaching teams to negotiate the best way forward. This devolution of resourcing enables teachers to identify on a daily, weekly, termly and yearly basis, where the necessary support needs to be geared toward.

In 9 years, no beginning teachers from [REDACTED] School have left the teaching industry. The support we have provided for them has inspired them to thrive in the profession with some going onto classified positions.”

Over the past few years, these additional resources have been diverted from other projects and priorities to ensure the needs of students are met.

29. 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?

The Alice Springs (Mparntwe) Education Declaration⁵⁷ establishes the education goals for young Australian which includes equity and excellence, and the declaration outlines an action plan which includes a commitment to monitor progress against the goals outlined in the Declaration. Then AEU recommends that progress against the goals of the Alice Springs (Mparntwe) Education Declaration is adopted, with increased participation from the teaching profession, as the primary measure of the effectiveness of the next NSRA reforms.

Such a report must demand accountability against specific targets to improve equity from all states and territories. The current NSRA Annual Report and the state and territory bilateral progress reports provide little scant information on the actual impact of any reforms or initiatives, and more often than not, merely state that a particular program exists.

The next NSRA must have clear reporting against each target for each state and territory.

30. Is there data collected by schools, systems, sectors or jurisdictions that could be made more available to inform policy design and implementation? What systems would be necessary to make this data available safely and efficiently?

As stated throughout this submission, the next NSRA must place educational equity at its centre, and demand system accountability. Subsequently, the data collection, analysis and reporting must shift to measuring equity, including concentrations of disadvantage and their impacts, and including analytic assessment of funding and its impact on increasing or reducing equity.

The AEU recommends that all data collected under the next NSRA must have the monitoring of progress towards equity as its priority, and should be reported in an annual NSRA Equity Report.

⁵⁷ Australian Government. (2019). Alice Springs (Mparntwe) Education Declaration, retrieved from <https://www.education.gov.au/download/4816/alice-springs-mparntwe-education-declaration/7180/alice-springs-mparntwe-education-declaration/pdf/en>

- 31. 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?**
&
- 32. Should an independent body be responsible for collecting and holding data? What rules should be in place to govern the sharing of data through this body?**

The AEU has long held that where there is an over reliance on NAPLAN data to characterise individual student achievement this can lead to contradictory insights into that child's performance when compared to teacher professional judgement and other diagnostic assessment methods used in the classroom.

The availability of de-contextualised NAPLAN data for individual students would create a particularly high stakes scenario for those students and their teachers, potentially leading to teaching and learning processes that are distorted due to an overemphasis on the monitoring of those individual students identified as being at risk. There is a danger that this overemphasis would come at the expense of the rounded and varied education teachers would prefer to provide.

If monitoring of individual students at risk of falling behind is to be implemented it must be done using existing data sources without requiring any additional assessment or compliance administration work from teachers.

The data for any monitoring of the progress of individual students must be de-identified by an Accredited Data Authority and any data linkage must be done by an approved Integrating Authority accredited to undertake high risk projects.⁵⁸ Student privacy must be a priority, and any longitudinal data collected on individual students must not be made available for any commercial use, nor made available to any organisation outside of Australian Government approved Integration Authorities. This protection is necessary to ensure that education technology companies are not able to exploit potentially very rich longitudinal data on individual students for commercial purposes.

The collection and reporting of such longitudinal data on individual students, for monitoring their progress, must have clear purpose which is student-centred. The purpose of this data must only be to provide the student's teachers with one type of information about the student's learning, to be contextualised and used by the teacher through the exercise of the latter's professional judgment and knowledge of the student and their needs, to inform the teaching and learning cycle, if deemed appropriate by the teacher.

Further data must be analysed and reported in a fully de-identified manner so that students do not self-stigmatize.

⁵⁸Australian Government, *Integrating Authorities: Rights, Roles and Responsibilities*, retrieved from: <https://toolkit.data.gov.au/data-integration/roles-and-responsibilities/integrating-authorities.html>

33. Is there data being collected that is no longer required?

NAPLAN has failed. It does not reflect global best practice in education, assessment and reporting. For example, Finland and New Zealand only use sample assessments to monitor student progress and the education system, and teacher professional judgment informs reporting to parents and students. Singapore also does not use census assessments for literacy and numeracy, and has been taking steps to address the negative effects of its high-stakes and competitive testing culture by refocusing on lifelong learning, holistic development and joy and intrinsic motivation in learning.⁵⁹ NAPLAN also narrows the curriculum and increases anxiety in students⁶⁰. It is not a valid test of writing and leads to formulaic and inauthentic writing and trivialisation of thought⁶¹. It demonstrably has not led to any significant improvement in student outcomes or Australia's standing in international test scores. In short, there is no need or requirement to maintain a national census assessment. Every year hundreds of thousands of students are subjected to NAPLAN without any justification.

A new comprehensive assessment framework must be developed that restores teachers' professional judgement of student learning as the prime consideration in its design - one that is classroom based and available for use at the best time as determined by the teacher, aligned with their curriculum and programs, provides rich diagnostic assessment of students' learning progress with scope for differentiation in assessment to respond to students' needs, abilities and diverse contexts and, that includes significant and meaningful input from the teaching profession at all stages of its development, implementation and evaluation. This framework must be orientated to improving the educational outcomes for all students, be curriculum-based, and incorporate the professional expertise of the classroom teacher. It must be educationally sound and useful and valid as a source of evidence about student learning. This new framework should include the following components:

1. A national assessment based on a comprehensive and inclusive sample that takes into account and addresses the wide range of learning needs of students in public schools. Such an approach would give parents, teachers and public officials a clear understanding of how various social groups, jurisdictions, and parts of the country are progressing.
2. Classroom based assessment by teachers using their professional judgement and collective moderation processes aided by a bank of test items focusing on literacy and numeracy and more broadly across the curriculum as appropriate that are aligned to the formal curriculum and delivered at the time of need as determined by the teacher.

59 Hwei Ming Wong, Dennis Kwek & Kelvin Tan (2020) *Changing Assessments and the Examination Culture in Singapore: A Review and Analysis of Singapore's Assessment Policies*, Asia Pacific Journal of Education, 40:4, 433-457, DOI: [10.1080/02188791.2020.1838886](https://doi.org/10.1080/02188791.2020.1838886)

60 Australian Education Union

61 Les Perelman, *Towards a new NAPLAN: Testing to the Teaching* (2018).

One example informed by this approach is provided by the Gonski Institute for Education and the University of New South Wales, who have already proposed a new sample based *National Assessment System* stating that “by refocusing on student learning, engaging teachers, and supporting schools we will fare better, and make better progress toward our national educational goals of ‘excellence and equity’”.⁶² Such proposals could be a useful starting point for investigating alternative approaches to assessment.

The AEU urges the Panel to consider the negative impact of the massive data gathering exercise that is current national assessment program on students’ wellbeing and on their experience of school, and to examine less damaging approaches such as the National Assessment Program proposed by the Gonski Institute, to understand the potential alternatives available and as a springboard for developing a new assessment framework.

34. How could the national USI support improved outcomes for students?

The national USI would be an effective tool if used in the appropriate context, and in a manner which was not onerous for educators or did not stigmatise or breach the privacy of students.

Funding transparency and accountability

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

As detailed earlier in this submission, there is an urgent need for much greater accountability and transparency from state and territory governments to account for their progress against the SRS contribution targets in their bilateral agreements. Further, as the current agreements provide almost no detail on how jurisdictions will incrementally increase their SRS contributions towards their targets in 2025, 2027 or 2032 it is very difficult for monitor progress.

Further, the inclusion of the 4% depreciation allowance as part of the SRS in the 2018-2023 bilateral agreements allows states and territories to write off over \$2 billion in public school funding per year. These items have never previously been included in SRS calculations and are not included in national SRS calculations. This narrows the gap between actual spending and the SRS goals by a further four percentage points and thus further reduces the actual effective SRS contribution made by each state or territory. It also undermines the entire concept of the SRS as a benchmark for equitable funding in schools and amounts to a separate capital depreciation tax levied only on public schools.

⁶² Wilson, R., Piccoli, A., Hargreaves, A., Ng, P. T., & Sahlberg, P. (2021). *Putting Students First: Moving on from NAPLAN to a new educational assessment system (The Gonski Institute Policy Paper #2-2021)*. Sydney: UNSW Gonski Institute., p. 65.

As Rorris notes:

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

The injustice of the 'capital depreciation tax' is magnified because it is only and arbitrarily applied to public schools. No such 'capital depreciation tax' is applied to the private sector. Nor are the private schools apportioned (based on their enrolment size) a share of the public costs associated with authorities responsible for education standards and curriculum.⁶³

The AEU strongly urges the Panel to consider the impact of this recurrent funding shortfall on the ability of schools to comply with the targets that will be set out in the NSRA, as well as their ability to ensure ongoing staffing and resources for the delivery of intensive learning and support programs for students. Indeed, the opacity of the way in which states and territories currently allocate their SRS contributions make it very difficult to monitor or draw conclusions on the impact that funding has on achievement currently.

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

&

37. What other funding accountability and transparency information regarding schools (both your school and the education system more generally) would be useful?

As outlined in the AEU response to questions 1, 27 and 38 jurisdictions should be required to provide detailed funding reports which are presented alongside the Australian Government Schools Funding Report so that their funding targets are clear and available to all. When jurisdictions fail to meet their targets this should be highlighted in a national report with binding actions that must be taken to comply. This report should include, both separately and combined, the SRS percentage and dollar amount contributions of Commonwealth and state or territory governments including the percentage and dollar difference between actual funding and 100% of SRS per state/territory and per student.

Much greater attention needs to be paid to the impact from the bi-lateral agreements from governments not meeting the full SRS on all equity measures for priority student cohorts.

⁶³ Rorris, *Ibid.*, p.8

A prime example of this deficit is the allocation of the disability loading. AEU analysis of data provided at Senate Estimates shows that failure to fund public schools to 100% of the SRS means that nationally in 2021 the 399,336 students in receipt of a disability loading received \$601.2 million less in disability loadings than they should have that year. The largest shortfalls were in the states with the largest student populations:

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

States and territories must also be required to reinstate the prominent reporting of the role of socioeconomic disadvantage in student learning as outlined in the response to question 1 to include the measurement of the uneven enrolment of students from disadvantaged households and from priority equity groups at national, state and regional levels.

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

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

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

Auditor-General Report No.18 2017–18 found that the Department of Education and Training did not have a sufficient level of assurance that Australian Government school funding had been used in accordance with the legislative framework, in particular the requirement for funding to be distributed to schools on the basis of need.⁶⁴

A 2021 follow up report found that:

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

⁶⁴ ANAO Report No.18 2017–18 *Monitoring the Impact of Australian Government School Funding*, retrieved from https://www.anao.gov.au/sites/default/files/ANAO_Report_2017-2018_18a.pdf

And concluded that:

- The department’s administration of legislated requirements to gain assurance that funding has been allocated, used and distributed in accordance with the requirements is partially effective.
- The department does not yet effectively support the transparency of Australian Government funding allocation and does not analyse school funding allocation data to ensure that funding is distributed in accordance with need.
- The department’s approach to assessing the impact of school funding on educational outcomes is not fully effective.
- The department does not yet effectively support the transparency of Australian Government funding allocations as prescribed in the Act and since 2018 has not completed work to ensure that funding distributed by system authorities is in accordance with the Act.
- The department does not ensure that the legislative requirement to report publicly on the application of any financial assistance paid to an approved authority is met
- The department does not always ensure that Non-Government Representative Bodies. (NGRBs) which allocate public funding to the private schools sector fulfil their transparency requirements.

The National School Resourcing Board has also made strong comments on the lack of transparency in school funding to approved authorities.⁶⁵

Very importantly, increased transparency must not result in even greater demands for compliance monitoring on teachers or school leaders given the immense workload pressures already existing, and the negative impacts of excessive compliance and data collection on teacher burnout and retention. Nor should it result in increased accountability on individual public schools, but must ensure that approved authorities and NGRBs improve the timeliness and accessibility of the data that they provide to the Department of Education, and that the Department in turn publishes that information in a timely and accessible way. Currently this data is only available in an appendix to the Australian Government Schools Funding Report and presented as a dollar amount with no reference to whether governments have met their obligations to students in priority cohorts in relation to the SRS.

The AEU recommends to the Panel that all SRS loading data is made easily accessible and scrutable and is reported against the full SRS loading amount.

The AEU also recommends that approved authorities are required to report the allocation of actual SRS loading funding to individual schools against each school’s entitlement.

⁶⁵ Heffernan, M, *Monitor calls for greater school funding transparency*, The Age , 6/10/2022, retrieved from <https://www.theage.com.au/national/victoria/monitor-calls-for-greater-school-funding-transparency-20220930-p5bm9e.html>