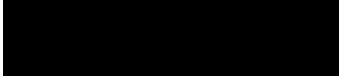




The Hon Fiona Nash  
Regional Education Commissioner



Dr Lisa O'Brien AM  
Chair, The Review to Inform a Better and Fairer Education System Expert Panel



1 August 2023

Dear Dr O'Brien,

### **Review to Inform a Better and Fairer Education System Consultation Paper**

Thank you for the opportunity to contribute to the consultation paper for the *Review to Inform a Better and Fairer Education System*. I provide my response as Australia's independent Regional Education Commissioner and a member of the National School Reform Agreement (NSRA) Ministerial Reference Group.

In my role as Commissioner, I advocate for people from our regions during their education journey from early childhood through school, vocational education and training and higher education, and the pathways between. Nearly a third of teachers work in regional, rural or remote settings, educating over a quarter of Australia's school-aged youth. Education is a doorway to opportunity that should not be closed to children simply because of where they live.

My comments focus on regional, rural and remote (RRR) communities, drawing on the findings in my 2022 Annual Report, many conversations with people in the regions in my 18 months as Commissioner, and decades of living and working in regional Australia. I have organised my response against the key areas set out in the consultation paper.

The advantages of a quality school education, and the opportunity to pursue a better future, should not be limited by location. Viewing these themes through a regional lens has the potential to bring enormous benefits to Australians living outside metropolitan areas, who have unique experiences and different needs from people in our cities.

#### **1. Lifting student outcomes**

There are significant gaps between learning outcomes for students in metropolitan schools and RRR schools, and these gaps increase over time. Children in RRR Australia deserve access to the same quality of education and to aspire to the range of educational and career opportunities as their metropolitan peers.

##### *Barriers to accessing education*

Children in remote locations with no physical school have limited choices, with significant financial implications for their families: distance education or boarding school. Distance education requires families to either sacrifice income to supervise their children's learning or to hire a tutor. Although some support is provided for these families, **the establishment of a Distance Education Teaching Allowance to support home tutors teaching geographically isolated students would greatly ease the financial burden on these families.**

Boarding school is often the only option for students living in locations without a physical school, or where the school does not meet the student's needs. Most boarding school students are from RRR areas (nearly 75 per cent), and around 20 per cent are First Nations students boarding off-country. A 10-year study of boarders from one Top End community found that many First Nations students drop out of boarding school

early on, due to a lack of connection with the school, feelings of isolation and a lack of support for students and families.<sup>i</sup> Rather than being supported to pursue educational opportunities, these students end up with no educational alternatives to fall back on.

**The panel should consider further options to enable First Nations students to board on Country, such as the National Indigenous Australians Agency *Building On Country Boarding Schools* program model, designed to support connection to country to protect and sustain the wellbeing of these students.**

Programs like the Commonwealth Regional Scholarship Program, which will provide scholarships to RRR students to assist with boarding fees and associated costs, are positive initiatives.

#### *Attendance, retention and Year 12 completion*

The rates of student attendance, retention and Year 12 completion demonstrate further disparity between RRR students and their metropolitan peers. In 2022, based on data from the ACARA National Student Attendance Data Collection, Year 9 student attendance levels were higher in metropolitan areas (85 per cent) than in inner regional (81 per cent), outer regional (80 per cent), remote (73 per cent) and very remote (53 per cent) areas.<sup>ii</sup> Non-attendance has a serious impact on RRR students' learning outcomes, engagement with the community and peers, and career pathways. Quality teachers and early intervention are two responses that can have a critical impact on student attendance.<sup>iii</sup>

Retention and Year 12 completion are significant issues for RRR students. They are far less likely than students at metropolitan schools to complete Year 12 and obtain their Senior Secondary certification. The final report of the *National Regional, Rural and Remote Tertiary Education Strategy* (Napthine Review) delivered in August 2019 highlighted that 80.3 per cent of students in metropolitan areas complete Year 12 or equivalent by the age of 19, compared to 63.9 per cent of students in inner regional areas, and 40.3 per cent of students in very remote regions.

To ensure effective action, we need to understand the particular pressures students in regional Australia face that might affect their school attendance and retention. The Department of Education, on my behalf, has commissioned a research project to understand the complexities of RRR students' decisions to remain in or leave secondary school and the strategies or good practices that can be adopted to improve Year 12 retention and completion. I anticipate this project will deliver its findings late in 2023.

Aspiration is a key piece of the puzzle. As I observed in my Annual Report, well-informed career advice, delivered by career professionals with local industry and tertiary education support and connections, makes a significant difference to the aspirations of secondary school students

**Improving awareness of existing resources is an important step to building aspiration. Again, this is a task for all jurisdictions.** Where it is not possible to have a specialist career advisor on staff at a school, there are centralised bodies such as the National Careers Institute (NCI) that can help address the gap in RRR areas in a culturally appropriate and locally informed way. Course Seeker is a joint initiative between the Australian Government and the state-based Tertiary Admission Centres that provides a national database of higher education courses and their eligibility requirements for any student to access online. However, students and their key influencers need to be aware of these resources in order to use them.

#### *STEM shortages and teaching out-of-field*

People across our regions, from school representatives to teachers, parents and students, to local councils and community groups, have told me that there is a particular shortage for specialisations such as Science, Technology, Engineering and Mathematics (STEM) teachers. This is backed up by data. Across Australia, around one in four Year 8 students is learning maths without a teacher qualified in mathematics. In RRR areas, in 2020, 23 per cent of regional or remote teachers were teaching maths out-of-field.<sup>iv</sup> Across all subjects, out-of-field teaching occurs at a rate of at least three per cent higher in RRR schools compared to metropolitan schools, meaning RRR students are also less likely to have access to specialist teachers trained in, for example, English, languages, legal studies, history, politics, drama, physical education, music, or art. Lack of specialist teachers in RRR schools, and teachers teaching out-of-field, contributes to teacher stress and over-work and affects learning outcomes for RRR students.

I appreciate that this is a problem without obvious short-term solutions, but I will be watching new initiatives such as those fostered by the Australian Government's Microcredentials Pilot in Higher Education with great

interest. Promising pilots successful in Round 1 of the program include Southern Cross University's new 'Postgraduate Certificate in Teaching Mathematics for Out-Of-Field Teachers' microcredentials pilot, Australian Catholic University's recently announced microcredentials pilots in phonics and STEM education, and the University of Western Australia's 'Einsteinian Physics for School Teachers' microcredentials pilot, designed to provide teachers without a science background with the knowledge to 'bring modern science and its applications in modern technology into the classroom'.<sup>v</sup> These and other recent initiatives, including existing short course programs in STEM teacher training and other subjects falling outside the Microcredentials Pilot<sup>vi</sup>, offer promise for upskilling the existing RRR teaching workforce, provided that schools are resourced **to provide teachers with opportunities and time for relevant professional development.**

### *Access to secondary subjects*

A related issue is the disparity of access to secondary subjects in RRR schools compared to cities. A study on regional and rural schools found that small schools of fewer than 500 enrolments (more often located in RRR areas) make, on average, 16 subjects available to their senior students, while 30 subjects are made available at large schools of over 1500 secondary enrolments.<sup>vii</sup> Regional students' aspiration and opportunity should not be limited or stifled by poor access to senior secondary subjects. Schools in our regions are responding creatively.

Some schools that not large enough to employ specialist teachers have formed clusters with other schools to share teaching resources. The cluster model is promising, and I note that among other initiatives targeted at improving the school experience of RRR students, the Victorian Government is providing \$5.1 million to support regional schools to work in clusters to strengthen curriculum delivery.

Partnerships with schools in regional or city centres have also enabled smaller or more remote schools to draw on networks to expand their offerings of subjects to students. For example, in recognition of the disparity in access to specialised subjects between regional and metropolitan schools, the Victorian Government is providing \$1.4 million for schools that are part of its Tech Schools initiative to offer and host STEM programs for RRR students, as part of its 2022-23 rural and regional education funding package. In another example, the Open Access College in South Australia, an amalgamation of two distance learning schools, provides a Curriculum Choice program for RRR students (and even whole class groups) to enrol remotely in subjects that are not offered at their own school. An effective existing model for building such regional-urban partnerships is the Australian Government's City-Country Partnerships program, which establishes partnerships between high-performing metropolitan schools and remote schools with a high proportion of First Nations students. Initiatives under this type of partnership model could include specialist teacher secondments to remote schools or joint online learning programs. **The expansion of this program would bring much-needed specialist resources into remote schools.**

Drawing on the lessons learned during the COVID-19 pandemic, virtual delivery has the potential to have a greater impact giving RRR children access to the range of subjects offered to students in metropolitan schools. A number of Australian states are providing funding for outreach and virtual programs to improve the access to specialist subjects for RRR students, as well as to provide out-of-field training for RRR teachers. For those specialist subjects that cannot be delivered virtually, **the expanding network of Regional University Study Hubs (formerly Regional University Centres) could address gaps in facilities** or provide a learning space for secondary students from multiple schools or learning at distance. Study Hubs provide facilities including study spaces, break out areas, video conferencing, computer facilities and high-speed internet access as well as academic support services and pastoral care. **Implementation would require careful consideration and cooperation between jurisdictions and sectors, but is worth further investigation.**

## **2. Improving student mental health and wellbeing**

In conversations with people in regions, I have heard regularly that there are too few services to support mental health for students in RRR areas. Teachers, who may lack professional training, are often expected to provide student mental health support in addition to their teaching and pastoral workloads, affecting their own wellbeing, productivity and quality of teaching. The geographical, financial and supply barriers for students, teachers and schools accessing mental health services in RRR areas are endangering the mental health of students and staff alike.

There are existing programs in place that have the potential to address some of these barriers to mental health support. The Australian Government's *Be You* program provides schools (and early learning services)

with a range of student resources and access to consultants to guide schools through the implementation of a whole learning community approach to mental health and wellbeing. The Victorian Government's *Mental Health in Primary Schools Program* provides a potential model for increasing mental health services in every school. Under this program, funding will be rolled out to all Victorian primary schools by 2026 to employ a Mental Health and Wellbeing Coordinator as a classroom teacher. This role is responsible for implementing a whole-school approach to mental health and wellbeing for students, staff, and families based on a broad knowledge of the needs of the school community. In the secondary school space, the Victorian Government has funded every Victorian state secondary school and specialist school to employ an ongoing school-based Mental Health Practitioner. As funding is based on campus enrolments, it is likely that in smaller RRR schools, this type of role would only be funded part-time and it may be difficult to find suitable candidates in RRR communities with workforce shortages. **Flexibility in implementation could make an enormous difference to the lives of young people in our regions.**

A supplementary model could provide mental health first aid training to existing teachers to equip them with the skills to identify mental health issues in students (and colleagues), provide immediate support to students, staff and families and work on improving mental health awareness and stigma within the school community.

These proposals only address RRR students studying in schools. For those students studying at distance in RRR areas, virtual support services can link students to mental health resources. For example, Outback Futures, a not-for-profit organisation supplemented by government and philanthropic funding, provides mental health support for outback Queensland children, families and communities through on the ground outreach and telehealth services. Over 70% of their clients are under 18 years of age, demonstrating the strong need for this type of support for students in RRR areas. While some services will remain partially or fully subsidised, the organisation is transitioning to a fee-paying model. **Remote students studying distance education in all Australian states should have access to fully subsidised mental health support.**

### 3. Attracting and retaining teachers

As I described in my 2022 Annual Report (available at <https://www.education.gov.au/regional-education-commissioner/resources/regional-education-commissioner-annual-report-2022>), one of the most common issues in my conversations with people in regional Australia is the critical shortage of teachers — this remains one of the biggest challenges facing primary and secondary schools. Although teacher education is the second most common field of study in Australia, there are major workforce shortages including for primary, secondary, and special needs teachers; and these shortages are exacerbated in our regions.

These concerns about workforce shortages are born out in data. The Regional Australia Institute's *Regional Jobs 2022: The Big Skills Challenge* report, released in May 2023, showed that education professionals (excluding early childhood and education aides) experienced the third highest year-on-year vacancy growth of any job category in our regions.<sup>viii</sup> In regional NSW, the figures are even more stark — over the last five years, education experienced the largest increase in vacancies, with teacher vacancies in December 2022 more than six times what they were a decade ago, and up more than 20 per cent year on year.

Stakeholders identified that three key factors contribute to these shortages: a lack of local training options creates a barrier to studying and qualifying in-region, and the converse — RRR residents leave to study and do not return; difficulty attracting skilled educators to the regions; and low retention.

The steady increase in school enrolments in RRR areas intensifies these shortages, as demand increases while nationally, ITE graduates declined between 2017 and 2020.

#### *Attracting teachers to the profession and the regions*

The 2021 Quality Initial Teacher Education Review noted that many stakeholders raised social status and relative attractiveness of the teaching profession as reasons for declining initial teacher education commencements. In the general survey, 70 per cent of respondents indicated if teaching was more highly respected it would be a great deal more appealing to both mid-career professionals and school leavers. These issues appear in sharp focus in our regions, where teacher attraction is an issue of primary concern that interacts with a range of other critical issues in RRR areas, including housing, workload, access to childcare and remuneration. One proposed solution discussed at roundtables is the idea of **a teachers' aide gap year program to incentivise exiting year 12 students to work as teachers' aides during a gap**

year. Other proposed solutions included developing **an apprenticeship model, and the creation of 'rural teacher training' pathways.**

While stakeholders raised the many challenges of schooling in RRR areas, they were quick to add a reflection on how rewarding and unique the experience is and their feelings of gratification in contributing to the future of RRR Australia. **A significant, national advertising campaign focussing on the positive experiences of living and teaching, as well as the professional development opportunities, in RRR areas could draw existing teachers to the regions.**

#### *Retention in the RRR teacher workforce*

Retention of the RRR teaching workforce is a major concern nationally, leading to young and inexperienced teachers being overwhelmed by workload and isolated in understaffed schools. These phenomena are particularly acute in the regions. According to AITSL, 'workload and coping' remains the top category of reasons for leaving for those in the RRR teacher workforce, with 86 per cent citing this reason in 2018 and 2020. Stakeholders raised possible solutions including reduced workloads, improving community connections, providing ongoing learning opportunities, and financial incentives to encourage teachers to stay in RRR schools. While financial incentives have an initial impact on supply, research has shown that financial incentives on their own do not improve retention. We need to explore better ways to recognise teachers' worth.

Many teachers remain within the profession because they enjoy teaching and find it rewarding, although often challenging. Finding ways to recognise the important work that teachers do, and **provide valued teachers with professional development opportunities**, will be an important factor in improving retention of teachers in the workforce, as well as improving the rate of in-field teaching, as noted earlier in this response.

As noted in my Annual Report, investing in the continued growth and development of existing teachers demonstrates a commitment to them and recognises the value of their work. However, stakeholders have commented that RRR teachers struggle to access these opportunities as they cannot take time away from work in a profession that is already understaffed, and professional development opportunities often require travel to other areas, which can be a financial and time barrier. **Greater opportunity to undertake professional development locally would benefit RRR teachers.**

Encouraging experienced teachers to stay longer by **providing opportunities to improve their skills and advance their careers without the need to move** will also support increasing the teacher workforce.

#### *Improving pre-service preparation and providing ongoing support*

Regional Australia is as diverse in its communities as it is in its unique challenges and opportunities for teachers. It is important that prospective RRR pre-service teachers are aware before their placements that the challenges they will face in RRR schools and communities will often differ from the challenges of teaching in cities. Research has consistently shown that pre-service teachers have an under-developed, vague, or unrealistic understanding of what teaching and living in a RRR community involves. In smaller communities where local teachers are well known and respected, teachers are 'always on'. Early-career teachers may find they are underprepared to teach in multi-age classrooms, fail to engage with the different experiences and responsibilities of their students, experience social, geographic and professional isolation, housing stress, lack of permanency, and burnout. **Ensuring new teachers have received specific and high-quality preparation for the experience of teaching in a RRR school will improve their chances of success. Mentorship provided by experienced teachers is an important part of the mix, which must be supplemented by real world experience in RRR classrooms.** Positive experiences during placements will increase retention of teachers in the regions.

**Teaching apprenticeships** are a practical way to ensure new teachers have ample on the job experience to complement academic theory and develop familiarity with regional classroom environments; earning a wage while learning can ease the financial burdens of training.

As mentioned above, stakeholders proposed other initiatives that may warrant investigation, including a **teachers' aide gap year** and the **creation of 'rural teacher training' pathways.** For mid-career teaching entrants, **pre-service preparation, supported RRR placements, strong in-school leadership, ongoing learning and professional development opportunities, mentoring, and innovative community practices are all essential to attract these graduates to RRR schools, and to retain them.**

### *Diversity in the teaching profession*

A diverse workforce is better positioned to recognise, develop and foster the skills and capabilities of a diverse student body. This may be particularly important in schools serving larger numbers of First Nations students. A teaching workforce with cultural authority and cultural competence is equipped to recognise the unique experiences of First Nations students, nurture and certify their cultural knowledge, and build aspiration, especially if curriculum bodies **engage First Nations educators in meaningful co-design**.

The NSRA consultation paper notes that there is a significant disparity between the percentage of teachers who are Aboriginal or Torres Strait Islander (two per cent) and the percentage of First Nations students (six per cent). **Increasing the number of First Nations teachers and support workers would benefit schools and all students**, ensuring First Nations students receive culturally appropriate education aligned with community, as well as providing strong role models demonstrating post-school transitions and pathways.

To increase First Nations teachers, **ITE courses should provide financial, academic and culturally appropriate pastoral support during study**. I encourage the NSRA Expert Panel to consider whether there are pathways that could be introduced to accelerate teaching qualifications for First Nations people. In addition, I propose **a separate category to elevate First Nations 'assistant teachers' to 'partner teachers', in recognition of their unique skills and cultural knowledge, which are fundamental to learning**. I am aware that such an initiative would not necessarily be administratively straightforward and would require a flexible approach in light of existing requirements.

### **Options for consideration**

My Annual Report includes a number of 'Issues for consideration', including four that are particularly relevant to the question of how to build a better and fairer education system. I encourage you to consider their practicality:

- **Consideration 3:** Establish a Distance Education Teaching Allowance to support Home Tutors educating geographically isolated students via distance education where there are no alternatives. Providing financial assistance to these families recognises the value of their role and co-invests in the education of geographically isolated students.
- **Consideration 4:** Recognising the inequity of access to required subjects in senior school between students in metropolitan and RRR schools, current access to subjects in RRR schools should be reviewed, and consideration given to:
  - expanding existing virtual delivery models
  - developing a partnership model between two schools, potentially metropolitan and RRR, to deliver virtual elective subjects to RRR students
  - delivering senior school subjects through a regional school cluster model sharing teaching and curriculum resources across schools
- **Consideration 5:** The National Teacher Workforce Action Plan process should consider expanding local delivery of professional development opportunities for teachers in RRR schools, including through a formal teacher to teacher mentoring program (both intra- and inter-school) to enable more experienced teachers to mentor less experienced teachers.
- **Consideration 7:** Create a Year 12 school leavers Teachers' Aide program for RRR schools to aid schools facing a teacher shortage. Participating Year 12 school leavers would take a gap year to work as a Teachers' Aide in a regional school before commencing their tertiary education. Consideration should be given to HECS relief and VET-FEE HELP, and recognition of prior learning for those who complete the program.

Additional matters I have identified in this submission that I encourage the Expert Panel to consider include:

- Improving and expanding options for First Nations students to board on Country.
- Providing teachers with opportunities for professional accreditation in new fields, to reduce the rate of out-of-field teaching and improve subject availability in RRR schools.

- Outreach and awareness campaigns targeting RRR schools and community groups that ensure staff and students are aware of existing centralised resources like the National Careers Institute and Course Seeker, as well as grant and scholarship programs.
- A national campaign to promote the benefits and opportunities of teaching in regional Australia, and associated support and awareness programs for trainee and pre-service teachers interning or moving to regional schools.
- Flexibility in implementation of mental health initiatives that accounts for the smaller size of many RRR schools, and lower population density.
- Engaging First Nations educators meaningfully in curriculum co-design to ensure First Nations students receive culturally appropriate education aligned with community.
- Development of a separate category of educator to elevate First Nations 'assistant teachers' to 'partner teachers', in recognition of their unique skills and cultural knowledge, which are fundamental to learning.

I hope that this information is useful. Please do not hesitate to contact me at [fiona.nash@education.gov.au](mailto:fiona.nash@education.gov.au) if you would like to discuss these comments. I look forward to continuing to work with the Expert Panel as a member of the Ministerial Reference Group on this valuable review.

Yours sincerely,



Fiona Nash  
Regional Education Commissioner

<sup>i</sup> O'Bryan, M. and Fogarty, B. (2020), Boarding off and on Country: A study of education in one Northern Territory remote community, Commissioned Report No. 04, Centre for Aboriginal Economic Policy Research, Australian National University. <https://doi.org/10.25911/5f1fff279309f>

<sup>ii</sup> <https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/student-attendance>

<sup>iii</sup> Australian Institute for Teaching and School Leadership (2019), Spotlight: Attendance Matters, [https://www.aitsl.edu.au/docs/default-source/research-evidence/spotlight/attendance-matters.pdf?sfvrsn=5bb0ff3c\\_8](https://www.aitsl.edu.au/docs/default-source/research-evidence/spotlight/attendance-matters.pdf?sfvrsn=5bb0ff3c_8)

<sup>iv</sup> Australian Institute for Teaching and School Leadership, ATWD Key Metrics Dashboard, Out-of-field teaching, by remoteness (KLA), Mathematics/ Regional or Remote filters, ATWD 2023, Teacher Survey (2018-2022) [Key metrics dashboard \(aitsl.edu.au\)](https://www.aitsl.edu.au/key-metrics-dashboard)

<sup>v</sup> For more information, see: Southern Cross University's new Postgraduate Certificate in Teaching Mathematics for Out-Of-Field Teachers (<https://www.scu.edu.au/news/2023/microcredential-maths-teachers/>); ACU's Microcredentials in STEM (<https://www.acu.edu.au/about-acu/news/2023/june/acu-secures-funding-to-develop-micro-credentials-in-phonics-and-stem-education>) and University of Western Australia's Practical Earth Science Microcredentials (<https://www.uwa.edu.au/study/Courses-and-Careers/short-courses/UWA-Plus/Micro-credential-Practical-Earth-Science-Education>)

<sup>vi</sup> For example, see University of Western Australia's Teaching Outdoors (<https://www.microcredseeker.edu.au/explore/details/UWA-GEOSM506-teaching-outdoors>) and Features of the Universe for Teachers (<https://www.microcredseeker.edu.au/explore/details/UWA-ASTRM401-features-of-the-universe-for-teachers>)

<sup>vii</sup> Lamb S, Glover S and Walstab A (2014) Educational Disadvantage and Regional and Rural Schools, Australian Council for Educational Research, accessed 5 April 2023.

[https://research.acer.edu.au/cgi/viewcontent.cgi?article=1228&context=research\\_conference](https://research.acer.edu.au/cgi/viewcontent.cgi?article=1228&context=research_conference)

<sup>viii</sup> Houghton, K., Barwick, A, and Pregellio, S. (2023) Regional Jobs 2022: The Big Skills Challenge, Regional Australia Institute, Canberra.

[https://www.regionalaustralia.org.au/common/Uploaded%20files/Files/Regional%20Job%20Updates/The\\_Big\\_Skills\\_Challenge\\_Report.pdf](https://www.regionalaustralia.org.au/common/Uploaded%20files/Files/Regional%20Job%20Updates/The_Big_Skills_Challenge_Report.pdf)