

SUBMISSION TO
THE REVIEW TO INFORM A BETTER AND FAIRER EDUCATION SYSTEM

Submitted by:

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A SHORT OBSERVATION REGARDING THE AUSTRALIAN EDUCATION SYSTEM FOR CONSIDERATION

We claim to have a world class education system, yet we continue to struggle to maintain a high standing when assessed against all three commonly accepted international standards¹ for the measurement of education proficiency, this despite ongoing studies, reviews and agreements such as the National Schools Reform Agreement (NSRA).

The 2023 Review to Inform a Better and Fairer Education System Consultation Paper seeks ways to improve our practices in five significant areas. Unfortunately, we have failed to recognize that it is the actual structure of our education system that is the primary cause of our woes, and that the activities that will come out of this review will simply address some of the symptoms, but not address the root causes.

I would argue that it is our duty to our children to set our sights towards having the world's best education system, not an also ran world class system. If what we already have is a world class system, then perhaps that is not what we want.

The world's best education system, indeed any world's best, high performing, high quality organisation or enterprise will, inter alia, maintain, through a robust quality management and continuous improvement system, strict control over of all aspects of its business or activities. We do not do that in the Australian Education System, in fact if you look closely, we do not have an Australian Education System, but rather many hundreds, possibly thousands of semi-independent education systems over which we exert very little control at the national level. It is little wonder that we struggle, despite extraordinary effort by hundreds of people, to make any significant overall improvement.

If we are serious about having the world's best education system, we need to put in place the following as a matter of urgency:

1. An approved and mandated Australian National Curriculum.

You may say that we already have this, however, the curriculum is not mandated, which means that not all states are fully aligned to it. That is, we allow States and schools to embrace, amend or tailor the national curriculum to suit their real, or perceived local needs. With over 9600 schools in Australia², this means that we only have a rough idea as to what is being taught. That which is delivered probably resembles the approved national curriculum, but we don't actually know. This, you will agree, is unacceptable in the world's best education system. We must mandate the curriculum as this tells our teachers exactly **what to teach**.

¹ PISA, TIMSS and PIRLS.

² Review to Inform a Better and Fairer Education System Consultation Paper, page 8.

2. Approved and mandated lesson plans and other curriculum materials.

In the world's best education system, lessons would be delivered in a consistent manner across all schools. This is done intentionally to ensure that delivery is auditable and, if problems or shortcomings are identified, they can be quickly addressed. This is quality management in practice.

In Australia, we generally require our teachers to develop their own lesson plans and other curriculum materials. This takes teachers away from their core business of actually teaching, and whilst many teachers do develop excellent products, commonsense and probability theory, would tell us that there would also be many lessons that would be sub-standard. This is unacceptable. Teachers aren't training developers, so we shouldn't employ them as such.

If schools and or teachers are developing their own lesson plans and curriculum materials, then we have thousands of people all duplicating each other's efforts. A huge waste of tax payer's money and, more importantly, teacher's time. We need to engage a single team of professional training developers at the national level³ to prepare lesson plans and other curriculum materials⁴ for every subject and unit in the national curriculum. The system's quality management and continuous improvement processes would then periodically audit each suite of materials and address any shortfalls as necessary, and schools and teachers would have the opportunity through the quality management system to propose changes and innovative ideas.

Lesson plans and other curriculum materials must be developed, approved and authorised at the national level, and mandated, as they tell our teachers **how to teach the subject.**

3. Approved and mandated assessment materials.

There is an old saying that what gets measured gets managed. This is certainly true, but you must fully understand what you are measuring if you want to get the most out of your measurement activities. If, as is the current case in our education system, we don't know exactly what we are teaching, and we don't know exactly how it is being taught, measuring output only indicates that something may be wrong, but it can't tell us exactly what is wrong. Further, as is also the case in our system, with the exception of NAPLAN, schools and teachers develop their own assessment materials. Again, commonsense and probability theory will tell you that whilst many assessments will be of a high quality, many will be substandard. Further, with schools and teachers developing their own assessment materials, we have thousands of people duplicating each other's efforts. This is also unacceptable. Teachers are being tasked to develop artefacts for which they are not trained instead of being in the classroom, where both they and parents want them to be, and actually teaching. So, we don't know what we are teaching, we don't know how it is being taught, and we are measuring achievement in possibly thousands of different ways. I would argue that that is not indicative of a high-quality education system by any stretch.

If, or when, we put in place items 1 and 2 above, we must again commission professional training developers to prepare examination and other assessment materials for every unit within the approved national curriculum⁵. Further, every unit in the curriculum must be assessed if we are to have a truly quality, world's best, Australian Education System. It is of no use teaching a subject or unit if you have no idea if it is adding value.

³ I would suggest that ACARA be resourced to develop, approve and audit national curriculum materials.

⁴ There may be several different lesson plans etc for teachers to choose from in order to cover all cohorts, but all must be professionally developed, approved, and mandated from a single source.

⁵ There may be several assessment options for any individual unit to cover all cohorts.

Nationally developed, approved and authorised assessment materials must be mandated as these tell our teachers **how a subject or unit is to be assessed.**

4. An Australian Education System Information Management System (IMS).

With items 1-3 in place, we now know what we are teaching, how it is being taught, and it is being assessed and measured in a common and consistent manner. All this information and data must then be stored and maintained in a single centrally located IMS that contains all Australian Education System data and information. In addition to statutory administration and financial information, the IMS must be a single source of truth for all approved subjects in the national curriculum, all approved curriculum materials, and all approved assessment materials. Further, the IMS must contain all student enrolment, academic achievement data and any other education related data deemed appropriate. Management, administrative staff and teachers will be authorised to access some or all of the IMS and its associated databases via a formal need-to-know rule set and local IMS administrator.

5. A Quality Management System (QMS) and Continuous Improvement Program (CIP)

All four of the critical characteristics of the system outlined above must be wrapped up within an approved QMS. This will ensure that all materials, processes and practices are regularly reviewed and that action is taken to correct shortcomings as quickly as possible. Further, that all data and information contained in the IMS is, and remains, accurate, accessible, authoritative, authorised and complete, and is archived as necessary and in accordance with statutory requirements. A CIP will complement the QMS by proactively seeking opportunities for improvement from our school managers and administrators, teachers and other key stakeholders, formally assessing proposals, and implementing those that will improve the efficiency and or the effectiveness of the system. Further, any stakeholder can provide input to the CIP. This ensures that the benefits of innovative ideas are shared across the entire education system, not just locally or within a State or Territory.

I think that you would agree that if we implement items 1 – 5 above, and it is simply a decision, we would be putting in place the foundations for a strong, integrated and potentially world's best Australian Education System. Most of the artefacts we need will already be available: we have a national curriculum (just needs to be mandated), and there will be excellent lesson plans and other curriculum and assessment materials somewhere, in the Australian Education community that we can use. We just need to establish a centrally (federally) based training development team to verify and validate suitable current artefacts, develop those that are missing then appoint a single executive team to approve, authorise and mandate materials for each subject within an approved QMS and CIP.

COMMENTS ON CONSULTATION PAPER CHAPTERS AND THE ASSOCIATED QUESTIONS

Chapter 2: 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)?*

Every subject in the Australian National Curriculum (the Curriculum) has learning outcomes. If the Curriculum has been designed well, these individual learning outcomes will, in the aggregate, lead to our ultimate goals, viz:

- a. the Australian education system promotes excellence and equity, and
- b. all young Australians become confident and creative individuals, successful lifelong learners, and active and informed members of the community.

Therefore, to ensure that this is the case, we should be measuring the achievement of the learning outcomes for every subject / unit in the National curriculum through a common suite of mandated assessments in all schools, the results of which should be recorded (for every student) in a single national database. Results can then be assessed and analysed like for like, which is impossible under the current system where the curriculum is modified to suit local needs, and teachers design their own lesson plans and assessments.

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?*

The Consultation Paper (particularly Section 2.4.5) indicates ways to improve student outcomes that are self-evident, including the following:

- a. Provide the best training possible to our teachers;
- b. Mandate the National Curriculum (**this is what you will teach**);
- c. Provide our teachers with lesson plans and other curriculum materials that have been developed at the national level by highly skilled, professional training developers, and mandate those materials (**this is how you will teach it**), and let the teachers get on with teaching;
- d. Provide teachers with assessments / tests for each subject / unit that have been developed at the national level by highly skilled, professional training developers, and mandate those assessments (**this is how you will assess it**), and let the teachers get on with it;
- e. Provide teachers with access to a national education information management system / data base in which all student assessments are to be recorded, and mandate that system (**this is where and how you will record results**);

Note: a-e above would form the very minimum of a strong and quality national education system. We do not have these things in Australia, which is why we struggle to improve at the national level. The curriculum varies between schools, lesson delivery varies between schools and teachers, as do assessments. We can't possibly measure system performance with any degree of confidence, and take real corrective action.

- f. Minimise classroom sizes and teacher student ratios as much as is practicable;
- g. Teachers will readily identify students that have serious learning, discipline, attention and or mental challenges. These students should be separated from the others and, assuming they are to remain in the school, placed in classrooms where specialised teachers can tailor curriculum materials to suit the individual. In this way, the education experience and safety of the bulk of students is not compromised; and finally
- h. Let our teachers teach and not be distracted by administrative and other unnecessary tasks.

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

Students at risk of falling behind are readily identified by teachers simply doing the job for which they are trained. This is what teachers do, by definition. Other indicators will be absenteeism and or poor discipline, attention difficulties etc but again, teachers will see these things if they are allowed to teach.

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?*

Definitely not. We have allowed ourselves to become bogged down with identifying a number of cohorts. This adds unnecessary complexity to the system, grows the bureaucracy, increases administrative overhead and reporting requirements, confuses decision makers and redirects scarce resources.

As Section 2.3 of the Paper states, quote: *“The education system should provide the support all students require to succeed, while being careful not to introduce additional forms of disadvantage through the design of the education system itself.”* Unquote.

There is but one cohort – Australian students.

Most students will be able to successfully navigate the national curriculum, others will require some level of support within the education system, and or through social or mental health services. Teachers, by doing what they are trained to do, will identify those students requiring additional support, and report same to their administrative and management authorities. Those authorities will then work with teachers and parents and, if necessary external support services to determine the best way ahead for that student. We don't need to label or characterise our students, we just need to give them the support they need to succeed.

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?*

As for question one. Outcomes should be ascribed to each module of the Australian Curriculum. Teachers should assess each module and report accordingly. Adding measures is a growth industry which complicates the system, adds cost, and leads to resources being directed to data collection, analysis and reporting of these measures instead of looking at the root causes of any failure to achieve those outcomes already associated with the approved curriculum. Additional reporting against new measures, will place an additional unnecessary administrative burden on teachers. Let them teach.

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 targets in the next NSRA should be structured to provide us with a truly national education system. See my opening observations and my response to question 2 above. Get these basic elements in place, then we can realistically measure system performance, and move toward continuous improvement.

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

Firstly, reports should be kept to an absolute minimum, as discussed elsewhere in this submission, to reduce the administrative burden on teachers in particular. Reports should be submitted on standardised templates, and entered on a single national information management system (IMS) so that data can be mined by any authorised person at any level. Local stand alone or bespoke data bases should be outlawed. Proposals for the creation of new data bases within the national IMS must be approved at the national management level.

Chapter 3: Improving student mental health and wellbeing

General Comments

Our schools are institutions of learning. They are not there to provide social, policing or mental health services. However, schools are to provide a safe, inclusive, friendly and positive atmosphere, within which our teachers can deliver the approved curriculum, then assess and report the outcome. Schools are to have a no tolerance policy for bullying, sexual harassment or smoking / vaping etc.

Teachers are not qualified mental health professionals and should not be tasked with related duties. They are there to teach, assess and report. During the conduct of their duties, teachers will identify students who have serious learning difficulties, have self-discipline or attention problems, are unusually and or frequently disruptive in class and or pose a safety risk to themselves, their classmates or the teacher. Teachers should only be required to report these students, nothing more. It is then the school's management team's role to support and protect their students and teachers, by advising parents and referring students to external service providers for support.

Section 2.1.1 of the Consultation Paper states that quote: *"The Panel places equity and excellence at the core of its approach to improving student outcomes."* Unquote. Therefore, where it has been agreed that the students referred to in the previous paragraph are to remain at the school, they are to be removed to classrooms dedicated to these students and instructed separately by specialist teachers. Resources to support these specialist teachers are to form part of each school's annual budget submission. In this way, those students remaining in the original classroom do not have their learning experience degraded.

Whilst it is acknowledged that parents of children suffering with mental challenges wish for them to have as normal a school experience as possible, they must accept that the safety and learning experience of other students is not to be compromised. Unreasonable demands by parents are not to be tolerated.

Other than total numbers, there should be no requirement for schools to collect data on these students, that is the role of external social, medical and mental health services.

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?*

School management, administrative staff and teachers have worked together to put in place an environment that is safe, inclusive, happy and positive.

Teachers are engaging their students and, in doing so, assess their student's attitudes toward the school's environment, reporting any perceived deficiencies to management who have taken corrective action when deemed necessary.

The school does not tolerate bullying or any other anti-social behaviour, including smoking, vaping, swearing etc, and takes corrective action immediately these issues are reported.

Students with learning, discipline, attention or mental challenges are quickly identified by their teachers and action taken (see my response to question 2 at 2(g) above).

The school has developed and is executing protocols for liaising with police, social services and medical and mental health professionals.

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

If we had a truly integrated national education system, innovative solutions or proposals, from any source within the system would be captured within the national education system's IMS. Review Teams could then mine the IMS for inspiration or opportunities for improvement.

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

No, we don't need to measure this, schools are there to teach. All schools should put in place a safe, inclusive, happy and positive learning environment. If a student struggles within that environment from a well-being perspective, or if teachers suspect that there are external factors that are adversely affecting that student, then school management should liaise with parents and invoke previously established protocols for liaison with external support services and authorities.

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?*

No, this is what teachers do. They interact with their students and, in doing so gather information as to student perceptions of the school's environment and their general wellbeing. This is then reported to administrators and senior management at teacher meetings / gatherings. Senior management then investigate any issues of concern, take corrective action if deemed necessary or flag serious concerns to higher authorities. This is what management is about. We want students studying, not conducting surveys. We want teachers teaching the curriculum, not facilitating surveys.

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

They normally should have none, or very little, nor should they be required to have these skills and training. These are specific skill sets held by professionals. Teachers are there to teach, they are not mental health professionals. We have these services within the

community. Schools need to tap into those services, and remain focussed on their core role of educating.

If the school is to retain students with significant mental health and or behaviour problems, then specifically trained teachers should be assigned to those schools, and are to engage with local / community mental health professionals to develop a specific program for each student.

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

Communicate, coordinate and then collaborate. That is, go and talk to them. That is a core management role.

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?*

Communicate with local authorities to establish a protocol to inform and engage the associated service. It's called management. This is the role of the senior staff of the school. Teachers should simply report students of concern and capture their concerns on the student's formal record.

Chapter 4: Our current and future teachers

General Comments

The first thing that we Australians must recognise is the critical role that teachers play in under-pinning many aspects of Australia's national power. Teachers are vital strategic assets and must be recognised as such and held up to the community. We need a national program to do this.

As stated elsewhere in this submission, I believe that we should build the world's **best** education system, and therefore we would need to grow or, at least initially, import the world's **best** teachers. This would be a long-term project, primarily because most of our current and prospective teachers would have been brought up in our extant education system which, as international assessment evidence⁶ shows, is less than satisfactory.⁷

What I believe we should seek to create is an international reputation that recognises that Australian teachers are the best in the world, with the best training and experience. We want to create an environment where every person in the world who is thinking of teaching as his or her chosen profession would seek to become an Australian qualified teacher. We want every school in the world to be actively seeking to employ Australian qualified teachers. If we do this, and of course it will take time and effort to establish, we will not have a recruiting and retention issue.

To achieve this reputation, we need to first determine what knowledge, skills and attitudes would be required of the world's best teachers. That should be a task set in the next NSRA, and perhaps coordinated by ACARA. Once we understand and agree the knowledge, skills and attitudes required of the world's best teachers, we can then design the training system and growth programs necessary to build these new teachers, and to "upgrade" current teachers to

⁶ PISA, TIMSS and PIRLS)

⁷ See Consultation Paper section 2.3.1.

the new standard if necessary. Upgrading existing teachers would be at Commonwealth expense and undertaken during working hours.

Most importantly, the bar for entry into this new teacher training program must be set higher than any other teaching program in the world. We only want the most academically qualified and psychologically suitable entrants in the program. Similarly, the pass mark for award of teaching qualifications would also be set as the highest in the world. We want it to be known that if someone passes our teacher training, that they are the best in the world. All effort should be taken to assisting Australian students wishing to become teachers, and who are assessed as having the potential, to achieve the required entrance level.

Most importantly, we must never lower student teacher entrance and or qualification requirements in order to increase teacher numbers.

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

In my general comments to this section above, I outline a program to build the world's best teachers. With that proposal in mind, I submit the following:

- a. We take every opportunity to recognise the contribution made by teachers to our community. Whenever we can we get our teachers in front of the community;
- b. We start to build the reputation that if you become an Australian teacher, then you will be among the world's best, and will be in demand anywhere in the world;
- c. Those who qualify to attend the new teacher training courses (noting the elevated entry level), must have their education expenses met by the Commonwealth, and must be paid while they learn⁸ (Australian citizens only);
- d. Qualified (under the new system) Australian teachers must receive the highest salary package at their level in the world;

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

- a. Greater public recognition (See 15a above),
- b. The world's best salary package at their level. Some things that could be explored include:
 - reduced stamp duty on the purchase of their house and primary vehicle,
 - reduced insurance premiums on their primary vehicle,
 - reduced house and contents insurance,
 - discounts on council rates and taxes,
 - rent subsidies,
 - cheaper utilities (gas and electricity),
 - standing invitations to balls and other civic functions, and or
 - discounted dining, movie or sporting tickets etc.
- c. A determined effort to reducing their administrative, reporting and data collection overhead;
- d. Providing teachers with all the tools necessary to deliver the curriculum, including lesson plans and associated equipment;
- e. Providing teachers with assessment requirements such as exam papers etc;

⁸ If you want a product, you must pay for it. We want teachers, then we must be willing to pay for them. This is no different to Defence Force students at the Australian Defence Force Academy, or other scholarship programs funded by Federal, State or companies.

- f. Provide teachers with standardised reporting templates built into a common national education information management system;
- g. Greater support for teachers through the removal from their class rooms those students with discipline or attention issues or those posing a safety risk, as discussed above.

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

See 15 and 16 above, but also the opportunity to upgrade to a higher standard, making them more employable and attracting a better salary package.

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

See 15 and 16 above, but also where specialist teachers and additional class rooms are required for those students with learning, attention, discipline and or mental issues, that budget submissions are taken seriously. Failure to do so may mean that these students are returned to their original classrooms which puts safety and quality of learning experience of the whole class at risk.

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

See my general comments and 15, 16 above.

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

See my general comments and 15, 16 above.

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

See my general comments and 15, 16 above. international

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 HAIT certification and the Australian Professional Standards for Teachers?

See my general comments above. Chartered status similar to accountants and engineers may be a way to national and recognition.

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

These materials should have been developed by education specialists in conjunction with the development of the national curriculum. (See my response to question 2 at 2a-e inclusive) This is a management responsibility. Administrative tasks should be kept to an absolute minimum, and supported by standardised proformas and report templates etc.

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

Where possible, teachers should teach face to face with their students. This helps establish rapport, trust, well-being and helps the teacher spot students that are struggling with course content. However, some units will lend themselves to computer based and or online teaching. Nothing wrong with that provided the teacher supervises properly.

As I have stated previously in this submission, curriculum materials, including digital teaching aides for each subject / unit in the national curriculum should be prepared by professional training developers at the national level, and mandated to ensure that all units are delivered in an approved, consistent manner. Failure to do this will impact negatively on the system's quality assurance and continuous improvement processes.

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

National registration of say Chartered Teachers or Certified Practising Teachers, similar to that for engineers and accountants would lift their professional profile and public recognition.

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

General comment:

Data collection and analysis is a double-edged sword. Whilst it can be used for continuous improvement and root cause analysis of failures or shortcomings, it can quickly become a growth industry and our master. The more data we collect, and the more sophisticated our data management systems become, the more reports and graphs and spreadsheets we can produce, the more we start to redirect scarce resources to capturing and storing this additional data and analysing same, and the more we lose sight of what we are actually trying to measure.

We must only capture that data that underpins our aims.

Data is to be authoritative, applicable, accurate, accessible and correct. Collecting data and storing it in a multitude of sites at different management levels leads to duplication, confusion, frustration, misinformation, stale data, information gaps and, ultimately ineffective outcomes.

If we are going to have a truly national education system, then education data must be managed at the Federal level in a single database, accessible through a single, approved software package. Data is to be entered by those specifically authorised to do so, but may be used by many with a demonstrated and approved need to know. Local IT Administrators would provide database access / logins to personnel based on an approved rule set.

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

In a truly national integrated education system, measurement of the effectiveness of every unit in the approved national curriculum is critical to quality management and continuous improvement of the system. Assessment of every unit should be undertaken in exactly the same way, or ways (there may be several options to allow for assessing different cohorts) and the outcomes for every student recorded in a common national data base.

Access to data is to be strictly controlled, but readily available to those with a need to know.

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

See my response to question 26.

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?

Reporting on the learning outcomes of students with disabilities should be undertaken so that the effectiveness of our training programs for specialist teachers can be verified and validated. However, measuring and reporting of this data should only be value if:

- a. Students have been educated using mandated national curriculum materials developed by specialist training developers, and
- b. the assessment of these students is undertaken using assessment material (tests etc) that have been developed by specialist training developers at the national level.

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?*

A great deal of time and effort and expense will go into development and implementation of the next NSRA. Of course, progress on the targets should be reported, nationally, by definition. Metrics should be established against each target with progressive milestones. Achievement or otherwise against each milestone is to be reported. Where milestones have not been achieved, a narrative is to be included in the report describing what action is being taken and by whom to bring progress back on track.

If we don't measure and report progress against target outcomes, why bother having an NSRA?

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?*

Only data applicable to measuring the efficacy of the national curriculum should be collected in addition, obviously, to mandated or statutory administrative and financial data. We must try to avoid collecting data simply because we can, as it adds cost and overhead. Only collect data on what we need to measure.

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?*

No, teachers will identify students at risk of falling behind and take action accordingly.

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?*

There should be a single Australian Education Information Management System (IMS) that is funded and managed centrally (at the Federal level) by highly trained public servants. All Australian Education System information and data is to be captured in this approved and authorised system. No bespoke local systems are to be permitted.

Apart from core administration and financial information, the IMS must be the repository of, as a minimum:

- a. the approved Australian National Curriculum,
- b. approved curriculum materials,
- c. approved assessment materials, and
- d. education related data on every student within the Australian Education System.

Those with a need to know, will be provided read only or read / write access by dedicated system administrators using an approved rule set.

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

Having a dedicated Australian Education Information Management System, overseen by trained information managers and local administrators will help with archiving of data and

information, and the removal of stale or obsolete data. Specific rules are to be developed to ensure that privacy is maintained, whilst historical data of value is retained and archived. In the main, all data, once loaded will become a permanent record.

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

Student USIs would be a core feature of the Australian Education Information Management System, and serve the same function as a Medicare number, tax file number or driver's license number. USIs allow ready access to student academic and training records, enrolment information etc. They are essentially easy access to their folder within the information management system. I don't see any real impact on student outcomes.

Chapter 6: Funding transparency and accountability

General Comments

An Australian Education Information Management System (IMS) should be established at the Federal level. This IMS will be the sole repository for all Australian education related information, including all financial transactions and associated data.

All expenditure of public funds within the Australian Education System is to be captured in the IMS.

A rule set is to be developed that will prescribe how details of the allocation and expenditure of public funds is to be captured, formatted and reported, and when it is to be loaded to the IMS.

Expenditure of public funds will be independently audited annually.

All public-school budget submissions, including a breakdown of expenditure areas, are to be loaded to the IMS, and ultimately loaded to the public domain.

All approved public and non-public school approved budgets (public funds only) are to be loaded to the IMS and ultimately loaded to the public domain. Budgets are to include a breakdown of proposed expenditure areas.

Non-public schools should not be required to submit private funding records and associated expenditure, but are to report the expenditure of public funds in the required format and to schedule. That section of a private school's approved budget that deals with expenditure of public funds is to be loaded to the IMS.

The only funding related information that is not to be made public immediately are contractor's bids in response to education related tender requests (or similar). However, once the tender has closed and the contract awarded, details including financial data must be gazetted.

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

No.

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

Nothing to add here.

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

As stated in my general comments above, individual school budget submissions should be both loaded to the IMS and made public. This will show parents and other interested stakeholders where the school's management priorities are focussed.

By then publishing the actual budget allocation, parents and interested stakeholder are able to understand where school's efforts are to be focussed and why.

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

No specific comments here.