



**To: NSRA Expert Panel**

**Submission to the Review to inform a better and fairer education system**

The Western Sydney Secondary Principals Council appreciates the opportunity provided to make this submission and be consulted on the Review to inform a better and fairer education system (Review). We have chosen to address aspects of each of the terms of reference. If time permits, we would like to invite members of the panel to meet with us and/or to visit one or more of our schools, something that has not happened yet. Thank you for your work.

**For whom do we speak? (Terms of Reference 1, 4 and 5)**

This submission is made on behalf of the principals of 56 government school secondary settings in western and northwestern Sydney. Our schools are located on the traditional lands of the Darug and Gundagurra peoples and our schools teach the largest number of Aboriginal and Torres Strait Islander secondary students in NSW. We work in one of the fastest growing regions in Australia and our schools teach over 40000 students aged 11-18 from increasingly diverse cultural and linguistic backgrounds. Our schools enrol students from affluent communities, and from areas of entrenched and multi-generational disadvantage.

For students in the government secondary schools in western Sydney, education is not a support (Review page 3) – it is the driver of their learning and opportunity.

The impact of increased segregation in Australia’s secondary schools has been significant in western Sydney, with a direct (and negative) impact on the enrolment profile of many government comprehensive secondary schools, especially those in the outer metropolitan communities.

Not one of our government secondary schools has received 100% of the SRS (Schooling Resource Standard) while the growing number of non-government schools in our region have been among the most advantaged by the current funding model increasing social stratification and inequality at a faster rate than many other parts of Australia. Every one of the government secondary schools in western Sydney enrolls students from the “equity groups” identified in the review.

Our government secondary schools and settings also enrol students from other significant equity groups including students whose families are highly mobile, students in out-of-home-care (many living with grandparents), students who are carers, students whose families live in poverty and students with chronic health conditions that impact on their learning. For these schools and these secondary students, funding matters and, the evidence from government secondary schools in western Sydney is that there has been a negative impact on a range of educational, social, health and economic measures.

The WSSPC supports a USI for all secondary students and acknowledges that many students in government secondary schools in western Sydney already have a USI when they complete a first aid course, undertake concurrent study at TAFE or undertake training as a school-based trainee. Extending

the USI to Years 7-9 would also encourage the opportunity for an increased use of learning portfolios and passports.

The WSSPC agrees with the Review's premise that "Australia's education system performs well for many but not for all".

One characteristic of many secondary students enrolled in government schools in western Sydney is their need for "personal agency". If they are the only person in the family who can speak and write in English well enough to complete enrolment forms, they do it. If they need to understand their Year 9 mathematics homework and nobody in the family can do it, they do it. If they need to apply for university or TAFE and nobody else in the family has the skills to do it, they do it. If they need to work to support their families, many of them do it. And their secondary schools, teachers, principals and school staff create school cultures that support them to do so.

WSSPC members request that, in defining disadvantage and "equity" the panel acknowledges that there are inherent advantages and disadvantages present for secondary students that go beyond the economic and geographic definitions used for ICSEA. WSSPC members note that the NSW FOEI "family occupation and education" index has been a more reliable predictor of educational advantage and disadvantage for students in western Sydney. We anticipate there will be strong opposition from those who benefit from the ICSEA scale.

In the last 5 years, students in government secondary schools in western Sydney have been among the most negatively impacted by federal and state government decisions, economic circumstances, and social uncertainty. Secondary students in our region have lived experiences that have included COVID-19 hard lockdown for 50 % of our school communities, decisions to place most of Sydney's new high and medium density housing on traditional Cumberland forest lands impacting local micro-climates, significant flooding, bushfires, failure to connect the Metro train line between Tallawong Station and St Marys (limiting the access of students to the major employment hubs being established in SW and central Sydney), families experiencing much higher costs of living and significantly increased costs of university and further education. Critically, large numbers of our schools and secondary students are at the forefront of the current teacher shortage which, in at least 25% of our schools is now described as a "critical shortage".

In later sections of the submission the WSSPC members make recommendations related to professional practice and initial teacher education. In this introduction it is worth noting that, in the opinion of WSSPC members, the current teacher shortage in government secondary schools in western Sydney will get worse in 2024 and 2025 and will require completely different thinking and action by governments, unions and universities. There is evidence that morale and trust is very low in the profession and a perception that, the high quality of secondary teacher capabilities and expertise is not recognised, understood or valued. The recommendations made so far, including those in this Review paper, are unlikely to have the significant positive impact required and, we anticipate that the shortages will result in further declines in Australia's educational performance in the next 5-10 years. The impact will be hardest on those students and schools with the greatest need. Accurate information and data will be critical as will intentional and evidence informed policy that holds governments accountable.

### **Recommendation 1: Secondary Education (Terms of Reference 1, 2,3,4 and 5)**

In responding to this report, WSSPC members note our strong disappointment that this Review, like so many others, has little to say about secondary education and the educational needs of adolescent learners. Although the review identifies 15% of schools as secondary schools (page 8), it fails to use

enrolment data showing the number of students in secondary schools. If the review is to focus on student outcomes, it must also focus on the number of students for whom schools are working to improve those outcomes.

In the final report, WSSPC members would like the panel to include a much deeper consideration in each chapter and recommendation of the needs of secondary education and secondary students. As experienced and expert secondary educators, we recommend a deeper reading of the research and evidence base for student success in secondary education. We also want to state that while other organisations often have an interest in schools, schools represent the needs and interests of all students; other organisations represent their own interests, charters and funders.

There needs to be a much better recognition by governments, approving authorities, external think tanks, “relevant parties” (Review, page 33) and the community of the complexity of secondary education and, in the final recommendations an intentional differentiation in policy and practice that recognises the differences between 8-, 12- and 17-year-olds.

### **Recommendation 2: Funding pathways for secondary students (Terms of Reference 1)**

Given the nature of our students and schools, WSSPC members were disappointed that the focus on attendance, retention and attainment focused almost entirely on “Year 12 completion”. We strongly recommend that the emphasis be changed to focus on the “completion of Year 12 or equivalent” and that the panel members examine more closely the Review of Senior Secondary Pathways into Work, Further Education and Training (Shergold, 2020) before finalising their report. There are alternative pathways for 15–17-year-olds in most states and ensuring access to those pathways will be critical for significant numbers of students in government schools in western Sydney. Alternative pathways, including HSC equivalent vocational pathways, are already available in the non-government sector in western Sydney increasing the range of outcomes those students can access. [Looking to the future: report of the Review of Senior Secondary Pathways into Work, Further Education and Training \[Shergold review\] | VOCEDplus, the international tertiary education and research database](#)

It is our opinion that a narrow definition of attainment and student outcomes in secondary settings will risk undermining the impact of any funding, especially for “equity cohorts”.

Further, WSSPC members recommend that, using the Mparntwe Declaration as a guide, that the panel provides a definition (and accompanying measurable criteria) of the knowledge, know-how, skills, capabilities and dispositions that characterise an “educated 18-19 year old” (that is, a young adult one year after “Year 12”) to frame the measurement of the impact of funding.

### **Recommendation 3: Student outcomes in secondary settings (Terms of Reference 1)**

While WSSPC members acknowledge the decision of the Review panel to use the Productivity Commission’s definition of “equity”, it also expects the Review panel to contest what appears to be a very narrow, economic definition of equity – “equity in minimum or basic skills”. For secondary students, basic skills will not be enough; basic measures will not be enough. As expert teachers and leaders, WSSPC members acknowledge that the equity gaps in learning based on current measures (Review page 13) increase significantly between Year 3 and Year 9. As expert teachers and leaders, WSSPC members also note that the complexity of language, skills, knowledge, curriculum and assessment increases in the level of difficulty rapidly after Year 7. In addition to subject based literacy and numeracy, at a minimum, secondary students need to be able to think critically, solve complex problems, undertake research, and apply their learning in a range of ways.

Successful secondary students from all groups, and particularly from the identified equity cohorts, need much more than “basic skills”. Secondary learners need access to a broad range of outcomes and opportunities to access those outcomes. All secondary students in government secondary schools in western Sydney study “subjects” and attention needs to be paid to the outcomes required by “subject-based curriculum, pedagogy and assessment”, not just generic skills.

WSSPC members recommend that the Review attend to (at least) the following:

- A greater focus on using formative and summative assessment of student progress towards outcomes.
- Recognising that high quality secondary education, especially senior secondary education, is changing and that new definitions of “attendance” are needed if secondary students are to be able to take opportunities, complete new pathways and learn in a variety of contexts. The traditional “attendance is 6.75 hours per day on site” has not been a feature of secondary education this century and care must be taken to determine (and not undermine) what and how attendance is calculated for students undertaking different patterns of study.
- Assessment of the baseline knowledge and skills of students entering secondary settings (at the end of Year 6) using reliable and valid internal and external measures.
- Explaining the increasing complexity of secondary (or equivalent) outcomes based on the secondary curriculum and its subject-based nature.
- Taking a bold and urgent stance on using funding to redress the negative impact on the identified equity groups of the increasingly digital nature of applied learning in secondary settings. One of the greatest sources of inequality for students in western Sydney government schools is the lack of access to digital and device-based learning. For the identified equity groups this is a particular form of disadvantage that has been poorly researched, including its impact on students who do not use devices for learning when they mandatorily do external assessments like NAPLAN (and in NSW minimum standards assessment) online.

WSSPC members also recommend that the final Review funding and outcomes recommendations anticipate the expected positive and negative impacts of “artificial intelligence” on teaching, learning and assessment in the short, medium and long term for all students and students from the identified equity cohorts. ([Microsoft Word - Shaping AI & EdTech - LOBLE - Final report - December 2022.docx \(uts.edu.au\)](https://doi.org/10.57956/kxye-qd9) Loble, L., & Hawcroft, A. (2022). Shaping AI and Edtech to Tackle Australia’s Learning Divide. University of Technology Sydney. <https://doi.org/10.57956/kxye-qd9>)

### **Recommendation 3: Wellbeing (Terms of Reference 2)**

The increasing social and educational segregation of secondary schools and students is reflected in the enrolment and wellbeing data in government secondary schools in western Sydney. The WSSPC members acknowledge the following key messages in the Review:

- Positive learning and wellbeing are important predictors of academic progress and attainment.
- Attendance (see above) and engagement are predictors of wellbeing.
- Poor mental health is increasing in secondary schools in western Sydney, especially for those students with experience of trauma, poor health and, in some case, drug use.
- Bullying, especially cyber-bullying, bullying of at-risk students and coercive behaviour are significant issues for secondary schools.

The WSSPC members also note that, unlike some other factors, community, family and student factors have a profound impact on the wellbeing of students, their peers, staff and the school. Serious and

critical incidents, often involving criminal behaviour have risen in the last 2 years, and these incidents affect schools in a range of ways.

It is important that the panel in its final report recognises that wellbeing is more than poor mental health. The antecedents of poor mental health also need to be addressed with intentional policy and funding.

In western Sydney there are now five secondary government schools that have dedicated classes for students experiencing severe anxiety, depression and suicide ideation. The WSSPC members support the specialist provision of classes and alternative structures for students at risk in mainstream settings.

Twenty-two of the government secondary schools in western Sydney are now funding significant staff learning in relation to adolescent mental health, anxiety and resilience using a program that was trialled in schools in the Hunter region because the issue was identified as one that was challenging across the region. Schools and groups of schools want to have the capacity to identify programs that will be effective in the context of the schools.

Government secondary schools and students in western Sydney have limited access to a coherent health and wellbeing service outside the school. The average “wait time” for an adolescent psychiatrist is over 12 months in most parts of western Sydney and departmental services cannot meet the demand with many specialist support positions unfilled.

There is a counsellor shortage in every secondary government school in western Sydney. Many schools pay for additional “online contingent counselling” from limited school funds.

The WSSPC members would like to see funding targeted to increasing physical and mental health services in government secondary schools in western Sydney, including the provision of health professionals with skills in adolescent health.

The wellbeing of students has been measured in NSW using the ‘Tell Them from Me’ survey. It is an attempt at longitudinal data but has some major limitations, especially in the use of only 3 items to set “wellbeing targets” for schools.

The WSSPC members support the federal Treasurer’s proposal to include wellbeing measures in economic reporting and to develop a framework that is “iterative, ongoing” and “to be updated over time...through continuous conversation with the community and developments in how we capture and collect data”.

As an initial recommendation, WSSPC members recommend that the government’s initial target be to immediately put in place funding, policies and practices to decrease the rate at which Australia’s concentration of educational disadvantage is growing (review page 16).

### **Recommendation 3: Recognising and valuing the place of schools at the centre of student learning and professional practice (Terms of Reference 1,2,3,4 and 5)**

The WSSPC members noted that the professional “voice” within schools, especially secondary schools was reported less often in this Review than other voices. In the final report, WSSPC members would like to see a much deeper recognition of the expertise that is in schools. This Review has the potential to be able to recommend policies and actions that work “with schools” rather than “work at, control, direct, tell or replace” the role of schools and teachers. In at least 3 chapters, WSSPC members highlighted that interest groups, “independent policy researchers”, “consultants” and other “relevant parties” were suggested as “expert panels” or alternative providers of teaching, wellbeing, curriculum, learning and accreditation in schools. WSSPC members do not support this approach based on

extensive practice evidence from secondary schools showing that many of these approaches have not worked in the past and some past initiatives of these organisations have been “fads” that did make any lasting impact.

Most of the WSSPC members have extensive teaching experience in NSW (and beyond). The WSSPC supports the ongoing use of the Australian Professional Standards for Teachers as measures of “effective teaching”. The WSSPC members expect that the panel (and AITSL and TEEP) publicly acknowledge the difference between “practice” and “formal accreditation”. Principals in western Sydney understand that “APST proficient” is a beginner qualification for initial and ongoing registration, like a driver’s licence. They speak of the more experienced secondary teachers and expert teachers as demonstrating their practice at Highly Accomplished and Lead, if not in all goals for the performance development plans, in the majority. Rather than recognise prior learning, AITSL and state/territory systems put in place bureaucratic barriers and significant administrative workloads that have created a public perception that Australia’s teachers (the majority of whom are women) are not good at their work.

The WSSPC questions whether the Grattan Institute approach to “career progression” (Review page 30) will add value to the profession, given the current circumstances. It is very like other proposals made in the last 20 years, most of which have not been funded and have not worked for government secondary schools in western Sydney. The WSSPC recommends that this panel asks the government to ask AITSL to identify ways to immediately and better recognise the quality of teaching practice in secondary schools using the APST descriptors as a “measure” of APST highly Accomplished and Lead practice that can vary across the standards.

#### **Recommendation 4: University Funding, Teaching Courses and HECS (Terms of Reference 1 and 4)**

Although not a major focus of this Review, the recent Interim Report of the Australian Universities Accord ([Australian Universities Accord Interim Report - Department of Education, Australian Government](#)) informed this submission in the following ways:

- Many of the families of government secondary students in western Sydney are “risk and debt averse” based on their own lived experiences. Without scholarships and intensive support, many of the students from the identified equity cohorts, will not attend and complete a university degree. WSSPC members support the recommendation of the Interim report to find new pathways for more students from identified equity cohorts to attend university. WSSPC member would also support this for those students who want to study a teaching degree.
- The differential increase in HECS for “humanities” degrees has had a negative impact on both students and potential teachers. Most secondary and all primary teaching degrees are classified as “humanities” degrees there has been an almost immediate impact on students completing teaching degrees in critical subjects, including English. Very few graduating year 12 students from government schools in western Sydney plan to teach in secondary schools with a direct impact on equity of the provision.
- Despite evidence that there have been shortages in secondary teaching positions across western Sydney for some years, universities and governments have continued to use “supply side economics” theories based on student enrolment preferences.

The WSSPC recommends that both the federal government and state and territory government departments design “accords” with universities that include partially funding innovative degree courses in areas of secondary subject need. There are examples in the secondary schools in western

Sydney that some Year 12 students would like to study a secondary teaching degree in subjects and disciplines in which they did well and have found there is no degree available.

### **Recommendation 5: Data, Transparency and Accountability (Terms of Reference 1, 4 and 5)**

In relation to the design, collection, analysis, and use of data to inform decision making and provide a basis for improving student outcomes, the WSSPC would like to recommend:

- That, in any new policy and practice, student data at an individual level in secondary schools is focused on the progress of each student on a range of academic, wellbeing and capability measures, enabling each student to develop their own learning portfolio to use for applications for employment, university and other tertiary pathways.
- That there is a balance between the value of data held on behalf of students in schools and the data sets created by systems and governments. The WSSPC members recommend that the NSW Higher School Certificate which includes both school-based assessment and examination measures is a good model of recognising components of progress and performance.
- That, as part of the NSRA, governments and jurisdictions will be required to provide high quality technical guides to explain the calculation of data sets, targets and outcome measures.
- That governments do a much better job in the future in holding governments themselves and approving authorities to account than has happened in the present and the past. In the extensive experience of WSSPC members, the following mistakes have been repeated consistently over the last 25 years:
  - Too great a focus on input measures – what schools and jurisdictions did with the funding and where it was allocated rather than what impact it made.
  - Too great a focus on “snapshot” measures rather than longitudinal data.
  - Too great a focus on programs and initiatives when there should have been a much greater focus on the practices that make a difference. On a positive note, the School Excellence Framework (Version 2) used in NSW defines effective practice and this enables schools to assess against descriptors. The same is true of the APST standards and descriptors. These measures, along with perception surveys like the full *Tell Them from Me* survey completed by students in NSW government schools, give some indication of how well practices are working and, over time, create patterns of evidence.
  - Aggregating data sets and making correlations to compare schools and cohorts of students that, while they may have some measure of reliability, lack validity in statistical terms. Just because something can be correlated, does not mean it should be.
  - Lack of transparency and consistency in communication from governments and jurisdictions about patterns of performance at a state and national level on tests such as NAPLAN.
  - Inappropriate and invalid target setting using partial data for the Key Performance Measures such as only using first semester data to calculate student attendance and calculating the 90% attendance target reports for schools based only on absences in first semester.

- Failing to question whether the large educational data sets available in Australia contain “good data” that was collected with “efficacy” and collected “ethically”, and has been managed with probity and integrity.
- Too heavy a reliance in secondary school policy determination on the work of “think tanks”, “enquiries”, “agencies” and “surveys” rather than high quality educational research.
- Setting unrealistic targets based on “norm referenced data sets” where the percentage of students in each standard deviation cannot be varied because the “bell curve” predetermines it.
- Assumptions that if governments have more data and link it better with other governments and agencies that they can make a difference because they have more data “visibility”. The current evidence from NSW does not support this assumption.
- Assumptions that schools will be able to increase their workload each time governments, agencies and “relevant parties” want to collect more data.
- That the panel is extremely cautious and defines its key terms (such as “good data”, “accountability” and “transparency”) in ways that are not only understood by both educators and the community but also have considerable rigour and are robust in the face of challenge.

WSSPC members also recommend that care should be taken with defining “what matters” as that may be different for schools located in different geographic, socio-economic and culturally and linguistically different contexts. It is critical that governments identify not just what “all students need to know and be able to do” using macro level data but also what the different identified cohorts can expect governments and decision makers to do for their children to achieve their best outcomes from schooling.

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