REVIEW OF THE NATIONAL SCHOOL REFORM AGREEMENT – INTERIM REPORT

DATE	26 OCTOBER 2022

1. ABOUT ISA

Independent Schools Australia (ISA) is the national peak body representing the Independent school sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISA represents 1,187 schools and over 667,000 students, accounting for approximately 16 per cent of Australian school enrolments.

ISA's major role is to bring the unique needs and contributions of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

Independent schools are a diverse group of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. A number of Independent schools have been established by community groups seeking to meet particular needs or to reflect the religious values of a community. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Independent schools include:

— Schools affiliated with Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Quaker and Seventh Day Adventist schools

— Non-denominational Christian schools

— Islamic schools

— Jewish schools

— Montessori schools

— Rudolf Steiner schools

— Schools constituted under specific Acts of Parliament, such as grammar schools in some states

— Community schools

— Indigenous community schools

— Schools that specialise in meeting the needs of students with disabilities

— Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other factors.

Most Independent schools are set up and governed independently on an individual school basis. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example Lutheran schools. Systemic schools account for 20 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

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2. ABOUT THIS SUBMISSION

ISA has prepared this submission in response to the Productivity Commission's Review of the National School Reform Agreement - Interim Report and seeks to address four key policy challenges facing Australia's school systems noted in the interim report as well as the draft recommendations.

ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

3. INTRODUCTION

ISA welcomes the perspectives put forward in the Productivity Commission Review of the National School Reform Agreement – Interim Report. The Interim Report acknowledges the difficulties and challenges in the delivery of the ambitious and complex change agenda in the current National School Reform Agreement (NSRA) and highlights areas for future focus as well as outlining avenues to explore in relation to flexible delivery, accountability and transparency.

ISA would like to reiterate that the national reform agenda is of importance for all students, and it is essential that all governments, Commonwealth, state and territory, recognise that what fosters quality of education is equity of access and opportunity, teacher expertise and relevance regardless of jurisdiction or sector.

While school funding is out of scope of this review, implementation of the NPIs is a condition of Commonwealth funding to states and territories under the Australian Education Act 2013 and the bilateral agreements set out the state and territory commitments to funding their contributions to government and non-government sectors in each state and territory. It is crucial that current funding relativities are maintained, and that funding continues on to be distributed on an equitable footing between sectors so that access, quality and relevance can be improved.

4. THE ROLE OF INDEPENDENT SCHOOLING IN AUSTRALIA

The non-government school sector, comprising the Independent and Catholic sectors, accounts for approximately one third of all school enrolments. In 2021, one in six school students and more than one in five secondary school students attended an Independent school. A comparison of 2021 data (below) shows that the only jurisdictions or sectors that were larger than the Independent sector were the Catholic sector and NSW government schools.

Fig 1: Size of jurisdiction and sector, 2021

NSW Govt	802,182
Catholic	740,065
Independent	667,259
VIC Govt	644,238
QLD Govt	573,832
WA Govt	292,450
SA Govt	173,471
TAS Govt	55,839
ACT Govt	46,092
NT Govt	30,002

Source: ABS Schools Australia

Despite the significant role the non-government sector plays in educating one third of school students in Australia, neither ISA nor the National Catholic Education Commission (NCEC) has direct representation in leadership forums beyond the level of Schools Policy Group (SPG). The non-government sector has no direct input into AESOC or the Education Ministers Meeting where decisions regarding the form, objectives, targets and outcomes of the NSRA are made. The outcomes of both these meetings, directly impact on the non-government sector, yet the focus of state/territory departments and Ministers is strongly biased to the government sector.

The Independent sector wishes to reiterate its concern to have the sector's views acknowledged and respected in the development of the NSRA and wishes to draw attention to the fact that even though the non-government sector lacks a voice at the highest levels, Independent schools continue to make a significant contribution in advancing the National Policy Initiatives.

5.   THE INTERIM REPORT – FOCUS OF THE NEXT AGREEMENT

The Interim Report Overview states that "the next reform agreement is an opportunity to change tack to focus directly on lifting student outcomes, improving equity, and enhancing student wellbeing" and focusses on "four overarching and interrelated policy challenges facing Australia's school systems."[1]

— Constraints on the effectiveness of teachers and leaders arising from such factors as:

— A lack of equity in student outcomes. This has several dimensions:

— Poor student wellbeing.

— The capacity of the education sector to adapt to changing contexts and needs.

ISA is highly supportive of these proposed directions for the next NSRA and the Independent sector's perspective on each of the proposed priority areas is outlined below.

CONSTRAINTS ON THE EFFECTIVENESS OF TEACHERS AND LEADERS

Australian schools are facing unprecedented teacher supply and retention issues caused by declining numbers of new graduates, increasing demand from a growing student population and an aging school workforce.

— In the next ten years the total Australian student population will grow by half a million, a 13 per cent increase over 2021. Current trends suggest that one third of this growth will be in Independent schools, exacerbating already significant workforce shortages in the sector.[2]

— Current initial teacher education (ITE) commencements decreased by 19 per cent in 2018 (28,894) and a further 1% in 2019 (28,694) at the same time as ITE completions declined by 11% in 2018 (16,831) and a further 1% in 2019 (16,644), reducing the teacher pipeline for all schools.[3] Fifty one per cent of Independent schools are located in Victoria and NSW, the states which have seen the greatest declines in ITE commencement and completion rates.

— The recent AITSL Spotlight notes that while attrition data is complex, "the ATWD Teacher Survey found that in 2020, 21 per cent of teachers reported intentions to leave the profession before

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[1] Productivity Commission Review of the NSRA Interim Report, p9.

[2] ISA Research Report - School enrolment trends and projections, July 2022, https://isa.edu.au/wp-content/uploads/2022/07/2022-Enrolment-Trends-and-Projections.pdf

[3] AITSL Spotlight – Building a sustainable teaching workforce, September 2022, https://www.aitsl.edu.au/research/spotlights/building-a-sustainable-teaching-workforce

retirement. A further 33 per cent were unsure. Of those intending to leave before retirement, 9 per cent intended to leave in one year or less (2per cent of total workforce), and 51per cent (10 per cent of total workforce) intended to leave within ten years".[4]

Independent schools, like their Catholic and government counterparts, find it difficult to source, recruit and retain teachers with the skill sets and experience required, when and where they are needed. Middle and senior leadership positions are similarly difficult to fill.

— Schools seeking staff with specialist skill sets (for example, physics teachers, music experts, disability specialists, residential care officers), are particularly affected. As well, the need for additional staff with qualifications in mental health and wellbeing areas has become acute, exacerbated by the impact on young people from COVID-19, successive lockdowns and interruptions to schooling.

— The one third of Independent schools and boarding schools that are regional and remote, are also significantly impacted by workforce shortage, consistently reporting few or no applicants for teaching and administrative positions and high staff turnover.

— The Association of Heads of Independent Schools if Australia's (AHISA) 2020 survey on staff recruitment, retention and turnover showed that shortages of teachers with required specialist and/or discipline knowledge and shortages of teachers with the required experience, were the challenges most commonly experienced by participating Independent schools.[5]

Independent schools and Associations of Independent Schools are engaged in a range of individual and collective initiatives and partnerships to address this cross sectoral, national workforce crisis. For example, the Embedded Practice teacher education courses offered by Christian Heritage College and Morling College across Queensland, New South Wales, Western Australia and the ACT,[6] and the GANE (Growing and Nurturing Educators) pilot being conducted by AISNSW to increase pathways into teaching.

To contribute to the 'big picture' solution, the Independent sector is actively engaged in the National Teacher Workforce Action Plan Working Group which is seeking to address these issues through cross jurisdictional and cross sectoral participation.

Independent schools would welcome recognition within the NSRA that workforce supply and demand issues are at crisis levels and can only be addressed by a national, cross sector action. In particular Independent schools as keen to be supported to:

— pilot and scale initiatives that address workforce challenges

— be an active partner with Catholic and government sectors in taking action to mitigate current and predicted teacher shortages.

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[4] AITSL, 2022

[5] AHISA Submission to the National Skills Commission, October 2020, https://www.ahisa.edu.au/AHISA/Advocacy/Submission_Resources/Submissions_2020/Skills_Priority_List_consultation_National_Skills_Commission.aspx

[6] https://www.csa.edu.au/CSA/Resources-and-Media/Media-Centre/Media-Release/2022/Christian_Sector_Addressing_Teacher_Shortages.aspx

A LACK OF EQUITY IN STUDENT OUTCOMES

Independent schools serve some of the most highly educationally disadvantaged students in the country.

— The Independent sector educates 125,927 students with disability. This number has grown substantially over the past decade - four times the rate of overall enrolment growth.

— The Independent school sector has 93 special assistance schools, providing innovative, flexible options that primarily cater for students with social, emotional or behavioural difficulties such as anxiety disorders or clinical depression.

— In 2021, there were 16,662 Aboriginal and Torres Strait Islander students enrolled in 956 Independent schools or 81 per cent of Independent schools in Australia. Enrolments of Aboriginal and Torres Strait Islander students in Independent schools have grown at an average annual rate of almost six per cent per year over the last two decades.

— The Independent school sector is the largest provider of boarding in Australia, operating almost 75 per cent of all Australian boarding schools. Independent boarding school enrolments include 16 per cent Aboriginal and Torres Strait Islander students, and almost three-quarters of all boarding students are from rural locations

Disadvantaged students are taught within mainstream or specialist settings that include special schools, special assistance schools, boarding schools serving regional and remote families, Majority Aboriginal and Torres Strait Islander schools, including boarding schools, and in schools catering to students from different ethnic and/or cultural backgrounds, including migrant families and students from non-English speaking backgrounds.

The autonomy of Independent schools allows them to be highly responsive to student and family needs, however, providing effective learning for students and support to the teachers and families of disadvantaged groups can be challenging. Schools typically require skilled, trained and highly committed staff as well as customised facilities and partnerships with community and support services – securing and successfully maintaining this specialist environment is a constant challenge.

Teacher professional development and expertise in supportive strategies and tailored programs is critical for success.

Independent schools recognise and value funding provided to support disadvantaged groups but are also conscious that the human and financial resourcing required to achieve successful outcomes for disadvantaged students is significant and the regulatory and workload burden on teaching staff and school leadership to administer programs is high.

The Independent sector would support the consideration of additional cohorts of students as priority equity cohorts in the NSRA such as

— Students with English as a second language or dialect, and

— Children and young people living in out of home care.

The Independent school sector already caters to large number of students in these two categories, both in mainstream schools with large migrant intakes or that cater to specific ethnic and / or cultural groups and also through Special Assistance Schools which often cater to children and young people living in out of home care.

Independent schools would welcome a strong focus within the NSRA on equity of outcomes for disadvantaged or underrepresented groups including:

— the service they provide to disadvantaged students, to be understood and supported so that appropriate funding and program adjustments can be made, and individual support continue

— the Non-Government Reform Support Fund to be maintained to enable Associations of Independent Schools to continue to support schools in areas such as the NCCD

— the regulations and reporting burden associated with providing education to disadvantaged students be simplified which would also ensure that schools and their disadvantaged students receive the funding to which they are entitled.

POOR STUDENT WELLBEING

ISA noted the importance of mental health and wellbeing in our original submission to the Review of the NSRA and supports the focus on student wellbeing in the interim report. However, it is also important to note the significant recent impacts on staff wellbeing and the interrelationship with the staff workforce issues discussed above.

With a decrease in the average age for onset of mental illness in recent decades and the impacts of the COVID-19 pandemic, the Independent school sector is faced with managing and supporting more students and staff than ever before with wellbeing and mental health issues.[7]

— Half of mental illness start before the age of 14 when young people are still at school[8]

— Approximately 11 percent of children aged 12 to 17 reported deliberately harming themselves and about 7.5 percent reported seriously considering suicide in the previous 12 months.[9]

— Psychological disorders are more likely if a student lives in an outer regional area and/or a low-income household, identifies as gender non-binary, is female and/or is Aboriginal or Torres Strait Islander[10]. Independent schools cater for all these groups

Traditionally, the mental health and wellbeing of students was left to the mental health care system, which plays a role in managing mental health once it has progressed to crisis level, rather than prevention and early intervention.[11] It is now recognised schools are ideal places to promote and protect wellbeing and support students with poor mental health if staff have access to the right skills and the capacity and time to act.

In May 2022, ISA published a commissioned report, *Student and staff wellbeing and mental health*[12]. which draws attention to a growing awareness of mental health and wellbeing and the overall increase in poor mental health. This change, coupled with the impacts of the pandemic, has significantly increased the need to protect and support both students and staff.

In a similar vein, the *Australian Principal Occupational Health & Wellbeing Survey 2021*[13] conducted by the ACU Institute for Positive Psychology and Education with 2,590 school leaders across all three sectors, showed rates of psychological ill-health and excessive workloads in schools leaders remain a concern. In 2021, burnout and cognitive stress were the highest since this survey commenced in 2011 and 29 per cent of school leaders were identified as potentially at risk in at least one of quality of life, occupational health, and self-harm.

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[7] Dr Emily Berger et al.

[8] National Mental Health Commission. *The National Children's Mental Health and Wellbeing Strategy*. Canberra, 2021.

[9] Young Minds Matter (2nd Australian Child & Adolescent Survey of Mental Health & Wellbeing, 2014

[10] Powell MA, Graham A, Fitzgerald R et al. Wellbeing in schools: what do students tell us? Aust Educ Res 2018;45:515–31.

[11] Runions and Cross, "Student and Staff Wellbeing and Mental Health."

[12] https://isa.edu.au/documents/report-wellbeing-of-students-and-staff/

[13] https://www.healthandwellbeing.org/reports/AU/2021_ACU_Principals_HWB_Final_Report.pdf

The wellbeing of school staff is intertwined with the wellbeing of students. Schools are most effective in caring for student wellbeing, if staff themselves feel supported and well-equipped.

Independent schools have invested in the health and professional development of their leaders and staff to support the wellbeing and mental health of students. Associations of Independent Schools have also been proactive in establishing programs to support whole school wellbeing such as the Compass program in NSW, or the School Psychology Service in WA.

In relation to Aboriginal and Torres Strait Islander students, Independent schools have been providing a range of pastoral and cultural supports for many decades. It is understood that whether education is provided on-country in community schools or off-country due to a lack of local provision, the needs of many Aboriginal and Torres Strait Islander students are particularly complex and include what the Association of Independent Schools of the Northern Territory refers to as 'cultural wellbeing'. For boarding schools that enrol Aboriginal and Torres Strait Islander students from remote communities this can involve significant liaison with families and the provision of extensive supports in schools to assist in transition and homesickness. The wellbeing of these students is highly critical to their successful engagement in education and is strongly supported by the Independent sector.

Independent schools would welcome an explicit focus on student, staff and school leaders' wellbeing in the NSRA accompanied by increased resources to meet wellbeing and mental health challenges, particularly:

— training and time to select and implement safe and supportive responses to protect and support wellbeing and respond to students at risk

— increased access to, and cooperation with, specialised services for students, staff and school leaders.

THE CAPACITY OF THE EDUCATION SECTOR TO ADAPT TO CHANGING CONTEXTS AND NEEDS

COVID-19 has been highly disruptive to student learning and the ability of Australian schools and teachers in all sectors to adapt to the ever-changing environment during COVID-19 has been key to lowering the risk of learning loss for many students.

As the country moves out of the public health crisis, hybrid teaching has become an important part of flexible delivery to keep students engaged in learning while away from school. Independent schools were well placed to move to hybrid modes of delivery due to their response to remote and online learning during the earlier waves of COVID-19.

Many Independent schools are now more comfortable and practised at delivering online teaching and learning. This new-found familiarity makes it possible for some schools to investigate the provision of a blended learning model in the future, and to incorporate digital and online learning into existing practise.

One of the enduring educational legacies of the pandemic may well be an awareness of the need to equip all schools with digital platforms and tools for distance learning and to train and provide teachers with the skills required to operate in an accelerated digital environment so that these capabilities are retained and can be utilised in adapting to a changing educational environment

Equity of access to devices and bandwidth to enable online learning for students was also an issue during lockdown and while schools and governments tried various means of addressing these issues, for many low socio-economic and disadvantaged students and families, the barriers were insurmountable.

Independent schools would welcome a focus within the NSRA that ensures all schools have the teaching and technical skills and resources to embrace and utilise the advantages of technology including:

— Further research into best practice in the delivery of online and / or blended learning

— Better understanding and means of addressing of the equity issues that arose during COVID-19 including the barriers to digital learning.

6.   THE INTERIM REPORT – INTERGOVERNMENTAL COOPERATION

IMPLEMENTATIONAL FLEXIBILITY

As noted in ISA's previous submission, ISA sees value in having clear, achievable national policy initiatives that drive national improvement and reform. However, progress on the current NSRA National Policy Initiatives (NPIs) has been mixed.

While progress has been achieved in a number of areas, including the establishment of AERO, two significant national NPIs, the Unique Student Identifier (USI) and the Online Formative Assessment Initiative (OFAI) have become stalled. Both these initiatives received in principle support from the Independent sector and the sector has been active in not only in consultations and also in trialling the US in schools. Both projects have the potential to address concerns raised in the Interim Report in relation to teacher workload and measuring the progress and outcomes of students across all sectors of schooling but have become entangled in the politics of a federated system.

To avoid the non-delivery of national priorities in the future, ISA identified two possible alternative approaches. These were for the NSRA to stay at the higher strategic level allowing for greater flexibility in implementation across the country i.e., one goal, many pathways, or to commit to a smaller number of NPIs.

While the Interim Report suggests that additional flexibility may be required in relation to future reform priorities, such as the use of multi-jurisdictional projects to achieve national reform priorities, ISA wishes to inject a cautionary note which is that often the Independent sector relies on shared national expertise and national implementation processes to ensure equitable access / participation in projects across all states and territories.

State and territory government initiatives do not always extend to the non-government sector and without national commitments, it is probable that the non-government sector will not be included or given access to specific initiatives. This would lead to a highly fragmented approach to inclusion in and implementation of projects and initiatives in the national good.

The non-government sectors in states and territories would then need to rely on bilateral agreements negotiated between the Australian Government and jurisdictions to ensure national implementation of reforms across all sectors. This introduces high risks of variability and inequity.

ENHANCED ACCOUNTABILITY AND TRANSPARENCY

ISA's view of accountability and transparency in relation to the NSRA continues to be that reducing and focusing on key measures may provide more targeted and relevant information to Ministers, the school sectors, and the public. Consideration should be given to targeting evaluation available measures to specific reforms to better align with, and measure, the intent of the reforms.

While the Interim Report suggests an enhanced approach to measurement, there has to be a compelling rationale and evidence base for the collection of any new data, as well as a clearly articulated rationale for the ways in which data will be used to improve student experience and outcomes.

There are significant challenges for the Independent sector in creating new data collections and measures and implementing them on a national basis, such as for student wellbeing, with the reporting burden on schools and systems already significant. The Independent sector is non-systemic and does not have centralised system supports meaning that any new additional reporting burden falls directly onto schools. Where possible, ISA supports using the measures that are already in place to inform additional reporting.

Additionally, there are significant difficulties associated with the provision of disaggregated data in relation to student outcomes and priority equity cohorts given the non-systemic nature of the sector. The Independent sector does not have centralised data management systems and there are varying levels of technological and administrative capacity at each individual school. Without significant funding and support to the Independent sector, the provision of disaggregated student level data across the entire Independent sector is not possible.

7.   DELIVERING THE NSRA

IMPACT ON THE INDEPENDENT SECTOR

In considering future directions for the NSRA, the cost impacts on all jurisdictions and sectors, particularly a non-systemic sector, need to be considered. As noted in our previous submission, while participation in national action to improve education for all young Australians is welcomed, it is clear that implementation can create a new administrative burden on schools, particularly those with low technology capability. As a non-systemic sector, Independent schools do not have access to the centralised support mechanisms that are available to schools in systems. Consequently, the administrative and resourcing impacts on individual schools of implementation and accountability requirements, can be considerable and significant levels of support are required to adopt any new initiatives.

Further, it is not possible for the Australian Government to liaise with each individual school and collect progress data on meeting the national priorities, in a meaningful way. Efficiencies are achieved in the non-government school sector through funding non-government representative bodies to provide overarching sector support in meeting the priorities and facilitating evaluation and measurement processes and data collection.

The Associations of Independent Schools (AISs), as the Independent sector's representative bodies, will need to continue to provide professional expertise and support to schools to assist in the adoption of new initiatives and processes, and, at the national level, ongoing participation in consultations, working groups etc will be essential to keep national priorities and reforms a focus in the Independent sector. Currently this is able to happen with the assistance of the Non-Government Reform Support Fund (NGRSF) which supports state and territory AISs to meet their requirements under the national and state and territory bilateral agreements and engage in and contribute to positive educational reform. The continuation of this funding is essential, with schools requiring significant and ongoing support to implement current Australian Government education reforms priorities and local priorities.

MAXIMISING SUCCESS

In seeking ways to improve the progress of NPIs and the successful implementation of any new initiatives, it is important to note the NSRA is not the only driver of national reform and is in fact, the latest in a long line of national reform programs. As was noted in ISA's previous submission to this review, other initiatives, such as the National Partnerships (NPs), incentivised outcomes through the provision of reward money for the achievement of targets across the government and non-government sectors, which encouraged all sectors to achieve the goals of the NPs.

And, as noted above, several of the current NPIs, such as the USI and the OFAI, have both significant implementation costs and on-going participation costs for the Independent sector. This is both in terms of individual school uptake and the need for on-going sectoral support. For an initiative such as the OFAI, an Independent school would potentially need to upgrade IT systems, increase connectivity, invest in on-going teacher professional development, and maintain that effort going forward. Independent schools would expect that that professional development would be provided by the state and territory AISs, as they do for a whole range of government initiatives. These are significant costs for individual schools, and AISs, to bear. Understanding, costing and supporting the implementation costs for each jurisdiction and sector for each initiative is a critical element of the implementation of school and system supported NPIs.

BILATERAL REFORM AGREEMENTS

The bilateral reform agreements vary from state to state; however, they all focus on reform activities which align with the national reform directions of the NSRA. As noted in our previous submission, there are impacts on the sector through the bilateral reform agreements and associated bilateral reform plans which include the Independent and Catholic sectors in each state and territory in activities to meet the objectives of the agreements.

Given these impacts, it is imperative that the bilateral reform agreements and plans are developed in consultation with the non-government sector and with the needs and constraints of the Independent sector being taken into account. Further the Independent sector supports the inclusion of high-level objectives in both the reform directions of the NSRA and the bilateral reform agreements which are strategic and flexible enough to enable sectoral implementation based on local needs, while meeting national objectives.

8. CONCLUSION

ISA submits that:

— the views and perspectives of the Independent sector are important and must be recognised in the formulation of the new NSRA

— there is value in articulating a national policy agenda that drives national improvement and reform

— while funding is not the focus of this review, the bilateral agreements have a key role in ensuring agreed funding targets are met by state and territory governments

— given the non-systemic nature of the Independent schools, the sector relies on shared national expertise and national implementation processes to ensure equitable access participation in projects across all states and territories

— ISA supports the proposed reform directions outlined in the Interim Report

— the reform directions, the NPIs and the accompanying bilateral reform plans should set clear strategic directions while enabling flexible implementation and maintaining national consistency

— appropriate financial support and/or incentives are required to enable successful implementation of national education reform

— consideration be given to targeting available evaluation measures to specific reforms to better align with, and measure, the intent of the reform

— any new accountability and transparency measures should take into account the administrative and resourcing burden on individual schools, sectors and jurisdictions