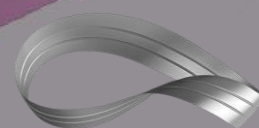# REVIEW TO INFORM A BETTER AND FAIRER EDUCATION SYSTEM

ISA SUBMISSION

AUGUST 2023

INDEPENDENT
SCHOOLS
AUSTRALIA

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present and commit to the ongoing journey of reconciliation.

CONTENTS

1. EXECUTIVE SUMMARY

Independent Schools Australia (ISA) is the national peak body representing the Independent school sector, comprising the eight state and territory Associations of Independent Schools (AISs). It represents more than 1,209 schools and 688,638 students, accounting for 17% of Australian school enrolments.

Independent Schools Australia (ISA) has prepared this submission in response to the *Review to Inform a Better and Fairer Education System* Consultation Paper. ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

ISA's major role is to represent the sector on national issues and bring the unique needs and contributions of Independent schools to the attention of the Australian Government. Independent schools in Australia are diverse and offer a choice of education for a variety of communities, with many providing religious or values-based education or promoting specific educational philosophies. Many Independent schools were established by community groups to meet particular needs or to reflect the religious values of a community.

ISA believes that there is value in articulating a national policy agenda that drives national improvement and reform to improve the outcomes of all Australian students. Equally important however, is recognition that reform in Australian schooling involves all sectors of education. It is critical that all sectors are involved in the development of new national reform directions, yet the Independent school sector - a vital part of the Australian education landscape - is not represented in key education policy bodies.

The cost of delivering national reform is significant for Independent schools, as they operate independently and lack access to systemic supports. A commitment to the resourcing of reform in all sectors is essential and will support Independent schools in implementing educational reforms.

Independent schools can make a valuable contribution to the development of the reform agenda, and to finding and being part of solutions. The autonomy of Independent schools means that they are ideally placed to trial and evaluate programs and initiatives, they are able to innovate, and are often early adopters of new technologies and pedagogical approaches.

Associations of Independent Schools (AISs) in each state / territory develop and fund initiatives and programs for action research in Independent schools. Some Independent schools also partner with universities, engaging in action research to develop evidence-based strategies to improve teaching and learning. Funding for these types of initiatives in all sectors is essential if national initiatives are to be sustainable.

All sectors of education are committed to improving the educational outcomes of all Australian students, including those that from a range of equity cohorts. Independent schools serve highly educationally disadvantaged students, including those from Aboriginal and Torres Strait Islander communities, students with disabilities, and students from diverse ethnic and cultural backgrounds. Supporting these students requires skilled staff, customized facilities, and partnerships with support services.

The measurement of outcomes in schooling is complex and requires careful consideration. The Independent sector emphasises the importance of a student-centric approach to learning and wellbeing and cautions against imposing data-driven approaches that burden schools and teachers.

Student mental health and wellbeing are major concerns, given the growing awareness of mental health issues and the impacts of the COVID-19 pandemic. Independent schools support whole-of-school wellbeing approaches and emphasise the need for increased resources, training, and access to specialized services for students, staff, and school leaders.

Australia faces a teacher supply and retention crisis, impacting all schools, especially in regional and remote areas. Collaboration between sectors and jurisdictions is crucial to address workforce challenges, and initiatives must be piloted and scaled to mitigate teacher shortages. While a

national registration system for teachers may have benefits, it should not compromise existing standards and requirements set by state and territory regulatory authorities.

While data collection is important, ISA argues that any new data requirements must be justified by a strong rationale and evidence base, with a clear plan on how it will be used to benefit students. ISA believes a student-centric approach, focusing on early intervention and targeted support, is more effective than a data-driven approach. The Independent sector is concerned about the additional reporting burden on schools and supports using existing data collections where possible to avoid further administrative strain. The provision of disaggregated data for student outcomes and priority equity cohorts is challenging due to the non-systemic nature of the sector.

Independent schools in Australia operate as not-for-profit institutions and are subject to extensive reporting and accountability measures, and school-level financial data is publicly available. All Independent schools are registered, required to meet and maintain educational standards and must be accountable to the government and the public for the funds they receive. Any additional accountability measures must be carefully considered, as they could increase the workload and cost for schools without improving outcomes. The allocation of funding under the current funding model means that there are inherent difficulties in linking individual funding dollars to student outcomes.

Independent Schools Australia advocates for a well-supported, student-centric education system that recognizes the unique contributions and challenges of Independent schools. Collaborative efforts and appropriate funding are essential to ensure a successful and inclusive education system that benefits all students across the nation.

RECOMMENDATIONS

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

— Any measures to address barriers for the identified priority cohorts must be cross sectoral so that there is parity and equitable access to reforms and initiatives for students.

— Any targets in the NSRA must be reasonable and achievable for all schools and sectors and should build on existing evidence. For this reason, ISA recommends a separate process to this Review.

— Any reporting against targets to measure the outcomes of schooling in relation to the next NSRA should not impose an unreasonable burden on schools and/or result in a highly data-driven approach to education.

— The primary focus should be on what supports schools put in place to support students, more than targets.

Improving student mental health and wellbeing

— Independent schools would welcome an explicit focus on student, staff and school leaders' mental health and wellbeing in the next 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 Review should consider the value and feasibility of the inclusion of a wellbeing target in the next NSRA as it is not possible to define optimal wellbeing, which makes including a wellbeing target in the NSRA highly problematic.

Our current and future teachers

— ISA recommends that the Review note and support the current work underway in the NTWAP and ITE processes and limit recommendations regarding teachers to those that sit outside current work streams.

Collecting Data to inform decision making and boost student outcomes

— The Review should consider the possible targeting of available evaluation measures to specific reforms to better align with, and measure, the intent of the reforms.

— There must 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.

— Any new data collections must take into account the administrative and resourcing burden on individual schools, sectors and jurisdictions.

Funding transparency and accountability

— The Review should recognise that the SRS funding model was based on the principles of subsidiarity and flexibility, with the acknowledgement that schools are best placed to know and meet the needs of their students.

— The Review should acknowledge that schools are best placed to know and to meet the needs of their students, and therefore reporting at the individual school level against specific loadings is not appropriate.

2. ABOUT INDEPENDENT SCHOOLS AUSTRALIA

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 more than 1,209 schools and 688,638 students, accounting for 17 per cent of Australian school enrolments.

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

Independent schools are a diverse group of non-government schools that provide families with choice in education and serve a range of Australian communities. Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. 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

— Aboriginal and Torres Strait Islander 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.

Many Independent schools were established by community groups to meet particular needs. Examples include the Independent community schools for Aboriginal and Torres Strait Islander students in remote areas, Special schools for students with disability and boarding schools to educate children from regional and remote areas.

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 the Lutheran systems. Systemic schools account for 17 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

3. INDEPENDENT SCHOOLING AND NATIONAL REFORM

Independent schools and Catholic schools, comprise the non-government school sector, and have been an essential feature of the Australian education landscape since the early 1800s. They educate a third of all Australian students. One in six young Australians is enrolled in an Independent primary school and one in five in an Independent secondary school. Independent schools are the fastest growing school sector in the country.

A comparison of 2022 data 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, 2022

NSW Govt	790,849
Catholic (national)	747,415
Independent (national)	688,638
VIC Govt	644,598
QLD Govt	570,110
WA Govt	292,818
SA Govt	171,983
TAS Govt	55,185
ACT Govt	46,188
NT Govt	29,331

Source: ABS Schools Australia, Department of Education Non-Government Schools Census

The important role of Independent and Catholic schools, however, is not represented on key education policy bodies. While they are represented in the Schools Policy Group, the non-government sector has no direct input into the decisions made at AESOC or the Education Ministers

Meeting where decisions regarding the future directions of national initiatives are made. The outcomes of both these meetings directly impact on the non-government sector.

The Australian school landscape is, or should be, a partnership between the government, Catholic and Independent sectors. Ensuring all sectors are adequately represented in policy bodies is essential to any reform of the school education system. A lack of proper representation and input undermines the potential for genuine, comprehensive national reform.

PARTICIPATION IN NATIONAL REFORM

The national reform agenda is of importance for all students, and it is essential that all governments, Commonwealth, state and territory, recognise that it is equity of access and opportunity that fosters quality of education, regardless of jurisdiction or sector.

ISA acknowledges the importance of the education reform agenda outlined in the current National School Reform Agreement (NSRA) and its basis in significant work undertaken through a range of reviews, including *Through Growth to Achievement; Report of the Review to Achieve Educational Excellence in Australian Schools* (Gonski et al 2018).

ISA's submission to that review noted the sector's support for many of the measures that were subsequently adopted as National Priority Initiatives (NPIs), including the importance of formative assessment, investment to support teacher and principal capability and enhancing Australia's education evidence base.

BILATERAL AGREEMENTS

The current bilateral agreements between the Commonwealth and each of the states and territories directly impact Independent schools in terms of funding, and through the agreed bilateral reform plans. These include the Independent and Catholic sectors in each state and territory in a range of activities designed to meet the objectives of the agreements. While the bilateral reform plans vary from state to state, they all focus on reform activities which align with the national reform directions of the NSRA.

Given these impacts, it is logical that the bilateral reform agreements and plans should be developed in consultation with the non-government sector and with the needs and diversity of the both the Catholic and Independent sectors being taken into account.

In terms of funding, while the Australian Education Act 2013 sets out the requirements for the government funding shares for each education sector, it is the bilateral agreements that set out the agreed funding targets for both the government and non-government sectors by state and territory governments.

ISA agrees that all sectors of education should be funded to 100% of the SRS as envisaged by the Gonski Review but notes that meeting this target for the government sector should not be at the expense of any other sector – all sectors should be appropriately funded to ensure the best possible educational outcomes for students.

THE COST OF DELIVERING NATIONAL REFORM

The cost impacts on all jurisdictions and sectors need to be considered in setting a national reform agenda. These will be different and significant for the Independent sector as schools are independent entities that do not have access to systemic supports.

The non-government sector has had access to funding to implement the Australian Government's educational priorities for over three decades. This funding has been essential in ensuring the sector's ability to participate in and promote national initiatives.

The current Non-Government Reform Support Fund (NGRSF), which is due to cease at the end of 2023, also 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.

For national reform to be successful, it must be resourced. The provision of funding to support the implementation of reform in the Independent sector is essential, as schools still require significant support, guidance and resources to implement current Australian Government education reforms priorities and local priorities as well as to implement any new reforms.

The majority of Independent schools are small, low – medium fee schools. Independent schools do not have the support mechanisms that are available to schools in systems and individual schools will require significant levels of support to adopt any new 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 any new initiative is a critical element of the implementation of school and system-supported priority areas.

Governments also rely on AISs 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 to non-government representative bodies which enables overarching sector support in meeting the priorities along with evaluation and measurement.

4.   WHY PARENTS CHOOSE INDEPENDENT SCHOOLS

Parents' right to choose the kind of education their child receives is included in the Universal Declaration of Human Rights as well as the International Covenant on Economic, Social and Cultural Rights[1][2].

The diversity of Independent schools offers options for families of all religions, cultures and socio-economic backgrounds to choose schools that promote the values, educational philosophies and/or approaches to learning that best suit the needs of their children and their own beliefs.

ISA's 2021 *School Choice: A Research Report*[3], was the third research report of its kind since 2006 and it showed that between 2006 and 2021, parents' hopes and the reasons for their educational choices remain largely unchanged. Independent school parents (85%) believe Independent schools give them the opportunity to choose a school in line with their values and beliefs, and that the school meets the needs of their children (79%).

The report also showed that most parents want more from education than academic results. They want schools to play a part in their child's personal development, prepare them for employment and provide skills that will be used throughout life.

In primary school, learning the fundamentals of reading, writing and numeracy are critical, as is children gaining confidence and developing a love of learning and curiosity. In secondary school, parents value their child gaining confidence and positive self-esteem even more than academic achievement.

Educational excellence, good teachers, good facilities and a supportive and caring environment are the top four reasons parents choose Independent schools. Parents' choice of school is influenced by word of mouth from friends or other parents, as well as attending school open days, interactions with school staff and personal experience.

Questions about how Independent schools responded to COVID-19 generated positive findings: Independent school parents (82%) said their school had adapted well to the changing environment

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[1] https://www.un.org/en/about-us/universal-declaration-of-human-rights

[2] https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights

[3] https://isa.edu.au/documents/school-choice-survey-report/

and cited good communication (68%) and moving quickly to online or remote learning (74%), as integral to this success.

The report also showed the vast majority of parents of children in Independent schools believe their school is doing well in preparing their children for the future and providing them with confidence and positive foundations.

ENROLMENTS IN INDEPENDENT SCHOOLS

Over the past 50 years, the Independent school sector has grown from around 114,000 students in 1970 to nearly 690,000 students in 2022, representing a change in student share from 4 per cent to 17 per cent.

In the last decade, the average annual increase in full-time enrolments in the Independent sector, at 2.1 per cent, has consistently exceeded the average growth at Catholic systemic (0.8 per cent) and government (1.1 per cent) schools. The Independent sector has also consistently exceeded student population growth.

This growth in enrolments has occurred in all states and territories, with the strongest rates of growth in Queensland (2.4 per cent) and New South Wales and Victoria (2.3 per cent each).

TABLE 1: INDEPENDENT SECTOR ENROLMENTS BY STATE, 2012 TO 2022

Source: Department of Education Non-Government Schools Census

The Independent sector encompasses considerable diversity in size, location, and the types of students in schools and is significantly different to the narrow view of the sector as high-fee and 'elite'. There is a far greater percentage of Independent schools charging less than $1,000 per year, including those that charge no fees, than those charging over $20,000. In fact, the median annual fee charged per student is just under $5,300 per year.[4]

In the past five years, the highest rates of enrolment growth across the Independent sector nationally are from schools with fees less than $5000.

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[4] ACARA MySchool – 2021 financial data

TABLE 2: GROWTH IN THE INDEPENDENT SECTOR BY AVERAGE FEE RANGE 2017-2022
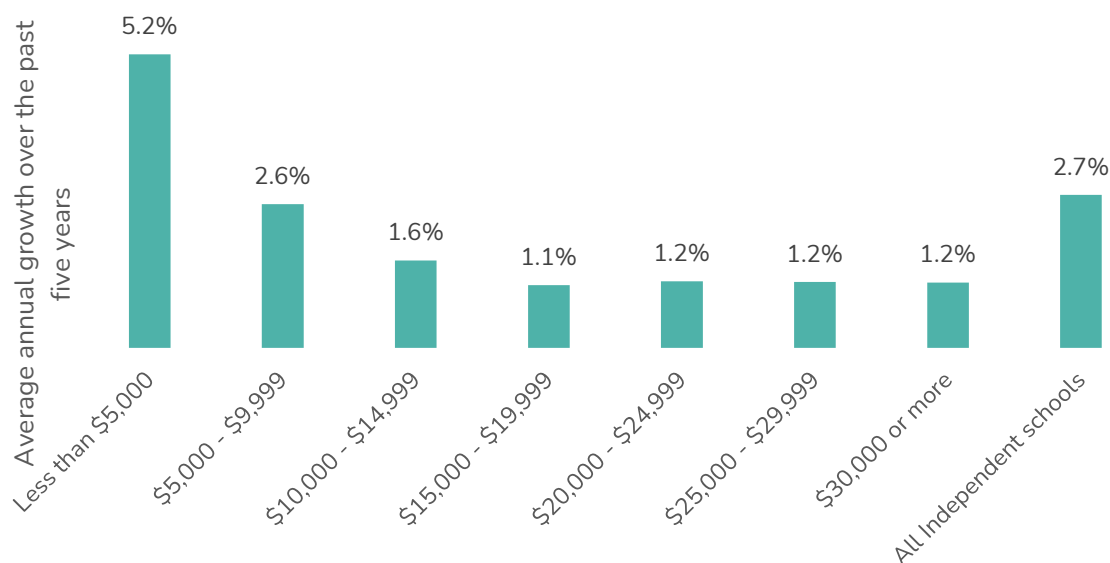
Source: Department of Education Non-Government Schools Census, ACARA My School

Both the major cities and regional areas are experiencing strong growth, most notably in inner regional areas. Remote areas of Australia have seen little growth in Independent schools, often due to low population growth in these areas.

The numbers of disadvantaged students in Independent schools, including students with disability, Aboriginal and Torres Strait Islander students and students with a language background other than English, have been increasing at a higher rate than overall sector enrolments for many years.

GOVERNANCE AND AUTONOMY

Unlike the government and Catholic systems, the majority of Independent schools operate autonomously, without reliance upon central bureaucracies which enable redistribution of funding and economies of scale. More than 80 per cent of Independent schools are governed by their school board or council and are primarily accountable to their parent and school community.

Each Independent school is responsible for its own educational programs, financial decisions, staffing, co-curricular content and ongoing development and is accountable to its governing body, within the bounds of legislation and government policy. Key decisions around education provision, school development and staffing are usually made by governing boards.

The leader of an Independent school is accountable to their board or council for the school's day-to-day running and educational programs, including how they apply the strategic directions and ethos of their school.

When autonomy is combined with appropriate accountability – for education as well as responsible financial management – it has been found to be associated with better student outcomes. (source) Independent schools are highly accountable and must comply with the legislative, regulatory and reporting requirements that apply to all schools, corporate entities or charities.

The autonomy of Independent schools allows them to innovate and respond to the changing needs and expectations of students, families and society more broadly. As noted previously, the response of Independent schools to the COVID-19 pandemic, and also more recently in relation to the challenges posed by generative AI, illustrate the ways that Independent schools are able to lead the way in responding to pedagogical challenges. (see Appendix A)

5. EDUCATING EQUITY COHORTS

Independent schools include community schools for Aboriginal and Torres Strait Islander students in remote areas, specialist education settings for young people at risk and students with disability, boarding schools to educate students from regional and remote locations, large and small multicultural schools in cities and regional areas – all meeting the needs of Australian families.

Independent schools are in all Australian states and territories. They include small and large day schools and boarding schools, co-educational and single-sex schools.

Two thirds of Independent schools are in major cities and one third, including Aboriginal and Torres Strait Islander community schools, are located in rural and remote areas. Independent schools in the city also attract many students from rural and isolated areas.

The Independent school sector contains some of Australia's largest schools and as well as having a significant number of smaller schools. Thirty-one Independent schools (3 per cent) have more than 2,000 students, while at the other extreme, 136 schools (11 per cent) have fewer than 50 students enrolled.

The vast majority (79%) of Independent schools in Australia have less than 1,000 students with 37 per cent of Independent schools having fewer than 200 students, and 42 per cent with enrolments between 200 and 1,000 students.

TABLE 3: INDEPENDENT SECTOR SCHOOL SIZE, 2022
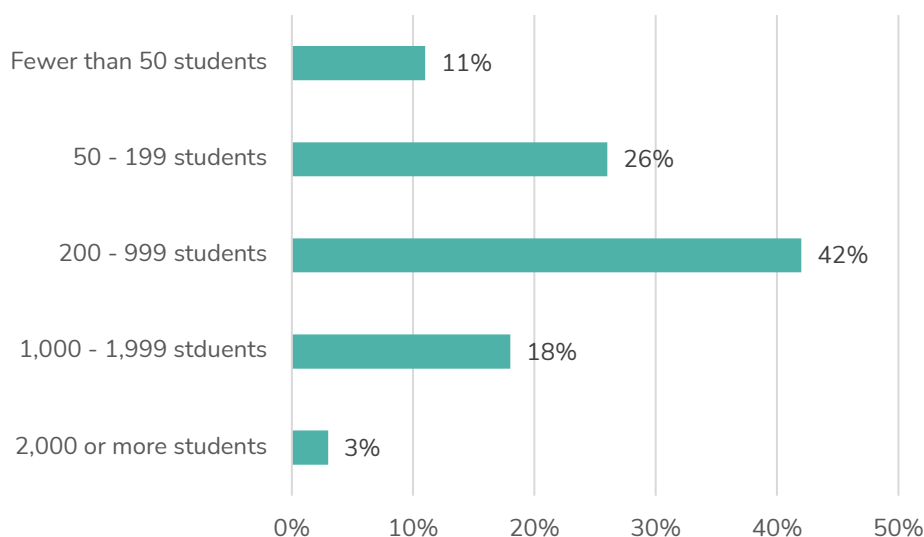
REGIONAL AND REMOTE STUDENTS

There are 416 Independent schools located in regional and remote areas enrolling 137,946 students and employing over 19,000 teachers and other staff. Similar to other sectors, over half of Independent schools located in regional and remote areas have enrolments of fewer than 200 students.

Schools in regional and remote areas face significant challenges in the delivery of education, from the increased costs of staffing, transport and ICT through to the delivery of the curriculum, the diversity of available subject choice and the provision of school visits to cultural and other institutions which would be taken for granted in metropolitan schools. Attracting and retaining teachers is a significant challenge for regional and remote schools.

As ISA noted in our submission to the 2020 House Standing Committee on Employment, Education and Training's *Inquiry into the education of students in remote and complex environments*, there is a

known education gap between the outcomes for students in rural areas and those in metropolitan areas.

The OECD's *What makes urban schools different? PISA in Focus* paper states that "socio-economic status explains only part of the performance difference between students who attend urban schools and other students". The paper goes on to identify school size, responsibility of the school for resource allocation, and staffing issues such as teacher shortages and staff qualifications as relevant differences and challenges for regional and remote schools.[5] However for many families, they are the only option.

For many parents and families, the issue of whether to educate their children locally or in another location, such as a boarding school, is a significant and difficult decision. In making this decision, these families weigh the benefits, opportunities, and disadvantages that may be presented by children boarding away or by staying at home.

The Independent school sector is the largest provider of boarding in Australia, operating almost 75 per cent of all Australian boarding schools. In 2022 there were 141 boarding schools in the Independent school sector, housing and educating 14,577 students. ISA estimates that nationally across all sectors 71 per cent of all boarding students are from regional and rural locations.

ABORIGINAL AND TORRES STRAIT ISLANDER STUDENTS

Independent schools are committed to building strong relationships with Aboriginal and Torres Strait Islander communities to close the education gap for Aboriginal and Torres Strait Islander students.

Aboriginal and Torres Strait Islander student enrolments are spread broadly across the Independent school sector. In 2022 there were 17,752 Aboriginal and Torres Strait Islander students enrolled in 974 Independent schools. Enrolments of Aboriginal and Torres Strait Islander students in Independent schools have grown at an average annual rate of over six per cent per year over the last two decades.

There are some Independent schools that provide education to significant populations of Aboriginal and Torres Strait Islander students, with many of these schools in rural or remote areas.

The entire concept of learning on-country in partnership with the local Aboriginal community is innovative in Australian education. [Our] students remain connected to their family and culture while being offered a world class, innovative delivery of curriculum. This has resulted in exponential growth of enrolments and attendance rates never before seen in the Northern Territory. It is a shining example of how education can be successful for First Nations students.
Annelise Pearce, Operations Manager, Dhupuma Barker, NT[6]

Aboriginal and Torres Strait Islander students from rural and remote communities are amongst the most educationally disadvantaged students in Australia. For many Aboriginal and Torres Strait Islander students living in regional and remote communities there is limited or no access to school

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[5] Independent Schools Australia, Submission to the House Standing Committee on Employment, Education and Training's Inquiry into the education of students in remote and complex environments, 2020.

[6] Independent Schools Australia, The Social Contribution of Independent Schools, 2023
https://isa.edu.au/documents/the-social-contribution-of-independent-schools-in-australia/

education, particularly at secondary level, and students may also have significant social and health issues, and many have traumatic backgrounds and disrupted educational journeys.

Independent schools in remote regions are often the sole providers of education for these communities, with 48 schools in the Independent sector having an Aboriginal and Torres Strait Islander enrolment comprising more than 50 per cent of the total enrolment.

We are really proud of the kids we are developing; they are young people who honour those who have gone before them, and they are the best example of Aboriginal and Torres Strait Islander culture – they are deeply connected to their land, people and traditions – they are not lost and disconnected. They are grounded, sensitive, respectful and decent modern young men and women.
Dr Debra Bateman, Principal at Mäpuru Yirralka College[7]

The majority of these schools face high costs in employment; provision of staff housing; transport; construction; maintenance; and accessing professional, student learning and cultural opportunities, due to their remoteness or distance from large population centres. When needed, these schools also provide additional educational, health, recreational, wellbeing and pastoral care services in order to assist students to learn successfully.

Independent schools that serve significant or solely Aboriginal and Torres Strait Islander student populations often have very limited capacity to raise private income through fees and fundraising; in many cases this ability is non-existent. These schools rely heavily on government funding to maintain their operations.

An Independent boarding school can sometimes be the only option for Aboriginal and Torres Strait Islander students from remote and regional communities to access secondary education. Many Independent boarding schools provide scholarships to support access to education for Aboriginal and Torres Strait Islander students or are involved in community-based programs to provide scholarships to these students.

The Independent school sector is the major provider of boarding school education for Aboriginal and Torres Strait Islander students, with Aboriginal and Torres Strait Islander boarders attending 120 Independent schools, constituting an important and growing cohort of boarders. Aboriginal and Torres Strait Islander students from remote communities attend boarding schools in both metropolitan and regional and remote areas, and many attend boarding schools interstate.

— In 2022, there were 2,145 Aboriginal and Torres Strait Islander boarders (15 per cent of all Independent school boarders) attending 118 boarding schools.

— Between 2014 and 2022, there was an approximate eight per cent growth in Aboriginal and Torres Strait Islander boarders.

— In 2022, there were ten Independent boarding schools where all the students were Aboriginal and Torres Strait Islander boarders.

[7] Independent Schools Australia, The Social Contribution of Independent Schools, 2023, https://isa.edu.au/documents/the-social-contribution-of-independent-schools-in-australia/

DISADVANTAGED AND DISENGAGED STUDENTS

Special Assistance Schools provide alternative educational settings for students with high-level social and emotional needs and cater for students who are at risk, have behavioural difficulties, or whose needs are better met by flexible learning structures that may not be available in all mainstream schools.

Special Assistance Schools make an important contribution to addressing educational disadvantage by generally serving young people who are disengaged from mainstream education. Students are often referred from community services, juvenile justice and other schools – both government and non-government. Special Assistance Schools have developed programs and structures designed to re-engage students in education and prepare them for further training and employment.

> *"School leaders, teachers and highly specialised support staff contribute to creating a safe and caring environment for students by developing positive relationships and using differentiated, flexible and inclusive approaches to teaching and learning. High staff to student ratios and small class sizes support individualised education strategies.*
>
> *As students who attend Independent special assistance schools often have a background of school refusal or long-term disengagement from school, having effective engagement strategies to support students in their transition back to school is essential. Providing students with the opportunity to determine their own goals focused on interests, abilities and strengths, results in engaged learning and participation in relevant projects.*
>
> *For some students, enrolling in an Independent special assistance school may be their last chance to complete their education, to change a negative trajectory into a positive one."*[8]

Since 2014, the number of Special Assistance Schools has almost doubled and enrolments in Special Assistance Schools has almost tripled. There were 48 schools in 2014 and 96 schools in 2022.

The growth is particularly notable since 2014, the year the reforms to school funding were introduced following the Review of Funding for Schooling, led by David Gonski. Under these reforms increased needs-based funding was made available to support this vulnerable group of students.

> *"We work with young people who do not flourish in a conventional school setting. Our constitution (and charitable status) is predicated on delivering programs and services that support young people who experienced significant disadvantages. Our 'Special Assistance School' status is based on the delivery of education opportunities for young people who have significant social, emotional and behavioural issues that contribute to educational disengagement. As such, our purpose is to increase the agency of disengaged and disadvantaged youth through the provision of transformative learning experiences."*
> *Fred Heidt, Executive Principal, Youth Inc., South Australia*[9]

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[8] Independent Schools Australia, Special Assistance School Showcase, 2023 p3, https://isa.edu.au/wp-content/uploads/2023/04/ISA-Special-Assistance-School-Showcase.pdf

[9] Independent Schools Australia, The Social Contribution of Independent Schools, 2023, https://isa.edu.au/documents/the-social-contribution-of-independent-schools-in-australia

STUDENTS WITH DISABILITY

Students with disability represent a significant number of enrolments in the Independent sector with approximately 143,500 enrolments, representing more than a fifth of the Independent school student enrolments. The number of students with disability in the Independent school sector has grown substantially over the past decade - four times the rate of overall enrolment growth, although the growth rate varies from year to year. This is consistent with the importance of the sector being inclusive, equitable and providing access to quality education for all students.

It is important parents can choose the educational environment that provides the best option for their child. Over six per cent of students with disability in Independent schools attend a special school that can support their needs. Most special schools, which cater solely for students with a disability, are Independent schools.

Parents choose special schools for their ability to provide specialised adjustments for their child's specific needs. This includes students who have been assessed as requiring extensive adjustments under the Nationally Consistent Collection of Data on School Students with Disability (NCCD).

Special schools make an important contribution to addressing the educational needs of students with disability by adjusting the curriculum and their teaching methods to respond to the needs of their students. Teachers in these schools are often specialists who work closely with other teachers, specialists and parents, to provide high-quality learning opportunities.

Many mainstream Independent schools also employ specialist teachers to work with class teachers and parents to develop individual learning programs and to develop strategies and materials to be inclusive environments and meet the needs of students of all abilities. Some schools employ teacher aides to work one-to-one with students during class as well as a range of other adjustments.

6. IMPROVING STUDENT OUTCOMES - INCLUDING FOR STUDENTS MOST AT RISK OF FALLING BEHIND

Independent schools serve some of the most highly educationally disadvantaged students in the country. 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 also critical for success.

Some students experience multiple types of disadvantage, including types not currently considered 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 recognise and value the 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.

Independent schools would welcome a strong focus in the next NSRA on equity of outcomes for all disadvantaged or underrepresented groups on the basis that the education and wrap around services they provide to disadvantaged students are understood and supported through the

provision of appropriate funding so that programs and individual support to students can continue and be enhanced.

Any measures to address barriers for the identified priority cohorts must be cross sectoral so that there is parity and equal access to reforms and initiatives for these students. One concrete way to assist schools reduce barriers for students from priority equity cohorts would be the simplification of the reporting burden associated with providing education to disadvantaged students. Disadvantaged cohorts are often difficult to collect data from and difficult to report on for exercises such as the Non-government School Census as engagement for these students may not look the same as engagement in a mainstream school.

In looking at 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, the Independent sector already has the example of Special Assistance Schools which engage with severely disadvantaged and / or disengaged students.

ISA's recent Special Assistance School showcase highlights a range of engagement strategies used by schools to engage with the students most at risk.

> *"Multiple strategies are used to scaffold learning and practical skills development. Combined with individual targeted transition programs to support school re-entry, teachers and specialist staff co-design Individual Learning Plans with students (and families when possible), supporting them to identify learning, social-emotional wellbeing and personal goals and make informed decisions and plans about achievable future pathways. These plans provide clarity to students, staff, families and carers, identifying when goals are achieved and providing opportunities to celebrate success."[10]*

Several AISs also offer programs for schools in the area of whole of school improvement with the aim of improving student outcomes through the implementation of evidence-based practice.

Other elements that play an important role are whole of school well-being approaches, discussed further below, and the partnership between schools and families including, where possible, consistent and clearly defined behavioural expectations supported by parents.

While not in scope for this Review, it is important to note that there is also a key role for early childhood education in ensuring that all students receive the necessary early interventions as early as possible. ISA's submission to the Productivity Commission's Inquiry into Early Childhood and Care notes the important role of Early Childhood Education Care.

> *"Early childhood education is not compulsory in Australia but provides the opportunity for positive experiences which benefit a child's physical, emotional, social and cognitive development. Children who attend early childhood education and care develop skills in self-care, attention and concentration, language, play and social-emotional skills. These are important abilities for transition to school as they teach independence, self-reliance and regulation.*
>
> *Early childhood education and care settings connect families to a range of health services and resources and provide opportunity for early intervention where specific developmental support and needs have been identified. However, with a lack of services in some areas, long waiting-lists or high fees, equitable access is not guaranteed."[11]*

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[10] Independent Schools Australia, Special Assistance School Showcase, 2023 p30, https://isa.edu.au/wp-content/uploads/2023/04/ISA-Special-Assistance-School-Showcase.pdf

[11] Independent Schools Australia, Submission to the Productivity Commission's Inquiry into Early Childhood and Care, 2023, p.7, https://isa.edu.au/wp-content/uploads/2023/06/ISA-Submission-PC-Inquiry-into-Early-Childhood-Education-and-Care.pdf

Access for all children to a high-quality early childhood program will lead to improved outcomes, however access to these programs is not universal and is particularly challenging in regional and remote areas.

The development of a preschool outcomes measure as part of the Preschool Reform Funding Agreement will also assist in identifying students requiring early interventions before they commence school. In the formal years of schooling, there is a need for an enhanced focus on personalised learning support to support students when learning gaps are identified.

TARGETS AND MEASUREMENT OF OUTCOMES

There are differing views in the Independent sector in relation to setting targets to improve student outcomes, particularly for students in equity cohorts. However, the sector is concerned that the proposed development of targets could also result in the imposition of an unreasonable burden on schools and result in a highly data-driven approach to education when what we should be seeking is a student-centric approach to individual and personalised learning to ensure each student is achieving the best possible outcomes.

Of the additional measures noted in the consultation paper, attendance is in fact already subject to reporting by all schools. And while engagement is noted as a possible area of focus, student engagement is conceptually difficult to measure therefore ISA would not support any national targets or measures.

It is also clear that reforms to improve education outcomes are, in many instances, contingent on parental and community engagement. The cycle of disadvantage is complex and while schools can work with families to improve student engagement, wider problems of poverty and impacts of Inter-generational disadvantage will continue to limit the ability of schools to improve student outcomes without coordinated whole of government action in the areas of social services, healthcare and employment.

Not least of these concerns are the difficulties inherent in measuring the outcomes of schooling in a meaningful way. Some of the difficulties of measuring outcomes in schooling include:

— Outcomes may be hard to define or measure, such as personal or social outcomes[12]

— Outcomes may be influenced by many factors beyond the school's control, such as family background, socio-economic status, or peer effects[13]

— Outcomes may take a long time to manifest or change, such as lifelong learning or career success[14]

— Outcomes may vary depending on the perspective or expectations of different stakeholders, such as students, parents, teachers, or policymakers.[15]

Any targets set would have to be reasonable and achievable for all schools and sectors and for this reason, we would argue that they require a separate process to this Review. There could be an enormous benefit in a collaborative process between sectors, systems and national education bodies with expertise, such as AERO, collaborating on the best way forward to evaluate success in the context of school education and understanding where differentiation is required while maintaining

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[12] https://www.iriss.org.uk/resources/insights/measuring-personal-outcomes-challenges-and-strategies

[13] https://www.oecd.org/education/school/46927511.pdf

[14] Measuring Improvements in Learning Outcomes: Best Practices to Assess the Value-Added of Schools - OECD

[15] https://cepa.stanford.edu/sites/default/files/The%20Challenges%20of%20Measuring%20School%20Quality. pdf

the flexibility required to deliver effective education to individual students at different stages of schooling.

Other key concerns for the sector in relation to outcomes measurement include any increases to the reporting burden for schools and also the impacts on teachers. As noted elsewhere in this paper, the reporting burden on individual schools is always a key concern for the Independent sector and ISA would not support any increase to the current, considerable reporting burden on schools.

It is also not clear whether additional targets and outcomes measures will result in more workload on teachers and greater impact on school budgets as teachers need more training, time and resources for implementation. At a time when there is such a focus on teacher workforce issues such as workload, attraction and retention, the introduction of additional teacher work without additional supports, for an untested and unproven benefit, seems foolhardy.

7. IMPROVING STUDENT MENTAL HEALTH AND WELLBEING

ISA noted the importance of student and teacher mental health and wellbeing in both our initial and subsequent submission to the Productivity Commission's Review of the NSRA and supports the focus on improving mental health and wellbeing in the consultation paper though cautions against any wellbeing targets and measures.

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, like other sectors of schooling, is faced with managing and supporting more students and staff than ever before with wellbeing and mental health issues.[16] Recent research highlights a range of areas for concern.

— Half of mental illness start before the age of 14 when young people are still at school[17]

— 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[18]. Independent schools cater for all these groups.

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.

In May 2022, ISA published a commissioned report, *Student and staff wellbeing and mental health*[19] 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.

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[16] Dr Emily Berger et al.

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

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

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

It is also important to note that 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 mental health, wellbeing and professional development of their leaders and staff to support the wellbeing and mental health of students. Associations of Independent Schools have been involved in the development of evidence-based approaches to mental health and wellbeing and developed programs to support whole school wellbeing such as the School Psychology Service in WA or have worked to develop resources for schools, such as the Wellbeing Toolkit developed by the Association of Independent Schools of South Australia.

These programs help schools school embed whole of school well-being practice which is critical as we also know that one-off well-being programs do not work. Wellbeing improves when there is a whole school approach, where every policy, action and decision aims to support wellbeing, not only for students but also for staff and where families support schools. The Independent school sector uses a range of evidence-based approaches to develop whole school strategies to wellbeing where wellbeing practices are implemented and lead across curriculum, practice, culture and policy. Whole school approaches include staff training, the provision of specialised student supports such as a wellbeing officer, counsellors and / or chaplains, clear pathways to external mental health services and short / no wait times.

And while 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, there are very real concerns in relation to the added burden on teachers and other school staff in expecting schools to also triage and respond to concerns in relation to mental health and wellbeing in lieu of professional health services.

Teachers should not be given extra responsibility in identifying and responding to students' wellbeing needs. Of course, they have a duty of care and have a deep sense of pastoral care and provide high levels of student support, but they are not experts, counsellors or psychologists and this needs to be recognised.

Schools alone cannot manage the dramatic increase in students showing signs of anxiety and poor mental health. Having greater support for school counsellors and those trained and experienced in mental health is required on every school site. ISA would agree with the Productivity Commission's view that "A clearer articulation of pathways and responsibilities will help ensure teachers do not feel they need to shoulder responsibility for student wellbeing alone"[20] but caution against the statement that the responsibility of a teacher is to 'identify and respond.'

Families have to be supported to care for their own child's mental health, but this must be combined with additional mental health services, especially in places with the greatest need, more information for families how to access services, and services working together with schools to provide professional expertise.

Principals and teachers should be able to make referrals, know who to refer to and know that action will be taken in a timely manner. For example, the development of a national portal which lists available supports for referral might assist schools. It would also be useful for school staff to know what criteria is needed for referral that is easy to observe / obtain. However, while helpful, these initiatives would not address the core issue of lack of access to mental health professionals across the country.

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

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[20] Productivity Commission, Review of the National School Reform Agreement – Study Report, December 2022, p28

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

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

TARGETS AND MEASUREMENT OF WELLBEING

All jurisdictions and a large number of systems and individual schools already have their own tools in place to measure wellbeing. A number of jurisdictional measures are cross-sectoral. A more practical approach to the measurement of wellbeing may be to provide a list of tested and validated wellbeing measurement tools for those schools that currently do not have anything in place. This would take into account the fact that wellbeing is nuanced for every individual and school context.

ISA is also concerned about the measurement of individual student wellbeing and how that data might be used. Any measurement must be purposeful to the student and the school, therefore localised wellbeing measures and reporting on improvement could be a way forward. The focus must be on the student, not the data.

ISA would also caution against setting wellbeing targets. It is not possible to define optimal wellbeing which makes including a wellbeing target in the NSRA highly problematic. Wellbeing is a continuum and can always be improved. A possible wellbeing target could be related to wellbeing improvement; that schools are working towards continual improvement.

Suggestions that National Assessment Programs surveys, such as NAPLAN, could be used to collect individual student perceptions data are flawed. For many students, NAPLAN testing is itself a stressor and therefore is not an optimal time to survey wellbeing. In addition, linking wellbeing data to NAPLAN has consequences for national reporting, privacy, how the data might be used, further ranking of schools and would make NAPLAN even more of a high stakes test.

It is also not clear what will be done with all the data that could be collected in relation to student wellbeing. Unless there is resourcing attached to improving wellbeing, it is just an additional data collection for schools to manage. A better and more useful target might be to improve access to mental health services for school age children and their families.

8. OUR CURRENT AND FUTURE TEACHERS

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. 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.

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 churn of school principals across Independent schools and the number retiring is also of concern for the Independent sector. School leaders in Independent schools have a greater workload as they do not have systemic support. Whilst there are many programs being offered by AISs and the Association of Heads of Independent Schools of Australia (AHISA) to encourage, support and mentor new leaders, there are many school leaders close to retirement age, and attracting new leaders is also an urgent priority.

Independent schools and AISs 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[21] allow an apprenticeship approach to initial teacher education, and the AISNSW Teaching Schools Hub program, a three-year initiative, aims to develop innovative, evidence-based projects to grow and nurture independent school educators (see Appendix A).

With the use of generative AI in education increasing, teachers and school leaders will require training and support if this is to be used ethically, effectively and be a support to teaching and learning and not another added burden.

In relation to ways that digital technology could be used to support education delivery, reduce teacher workload and improve teacher effectiveness, feedback from Independent schools gathered as part of ISA's submission to the House of Representatives Standing Committee on Employment, Education and Training *Inquiry into the use of generative intelligence in the Australian education system*, is that AI tools for teachers could reduce workload and drive efficiency in seven key areas:

1. Identifying students who need additional support and extension and designing intervention programs to improve student outcomes.

2. Assisting in developing assessments, marking, grading, lesson planning, and generating student feedback with consistency, objectivity and fairness in grading.

3. Collecting and analysing student data at scale (and low cost) and generating reports.

4. Undertaking and streamlining administrative tasks such as tracking attendance, and other record keeping requirements.

5. Using advanced software that can detect plagiarism.

6. Determining professional learning needs and recommending resources and further learning.

7. Developing a skills matrix to identify explicit skills that need to be taught to educators and students so that they can use and manage AI generated resources effectively by recognising dissonance and recognising and testing assumptions.[22]

The effective implementation of these measures will require the upskilling of the teaching workforce. This will require an understanding of how the next generation of teachers will integrate generative AI into their teaching and assessment practices and building those skills into initial teacher education courses.

ISA and AISs are participating in the current National Teacher Workforce Action Plan (NTWAP) processes and consultations to help find solutions for Australia's current teacher workforce issues through cross jurisdictional and cross sectoral participation and also made a submission to the recent Quality Initial Teacher Education Review.

ISA supports many of the recommendation made in the Teacher Education Expert Panel Strong Beginnings report including specific actions and measures that will ensure national consistency across ITE programs, identify key core content, and strengthen oversight and governance to ensure quality assurance in the delivery of ITE programs.

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 are keen to be supported to:

—   pilot and scale initiatives that address workforce challenges

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[21] https://chc.edu.au/teachforapurpose/

[22] ISA Submission to the House of Representatives Standing Committee on Employment, Education and Training Inquiry into the use of generative intelligence in the Australian education system, 2023 https://isa.edu.au/documents/submission-the-issues-and-opportunities-presented-by-generative-ai/

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

However, given the current NTWAP and ITE work underway, we feel that any creation of a separate pathway for work in this area would only create confusion and dilute the current efforts underway. ISA recommends that the Review note and support the current work underway in the NTWAP and ITE processes and limit any teacher workforce recommendations to those that sit outside current work streams.

For example, the discussion paper asks if there are benefits for the teaching profession in moving to a national registration system. Some in the Independent sector support such a proposal noting that potentially there could be benefits through lower costs, a single process for registration, improvements in data collection, national accessibility and consistency.

It has also been suggested that national registration could also include national processes for Highly Accomplished and Lead Teacher (HALT) certification for consistency and make it easier for teachers to move between states and territories, including allowing remote teaching across borders to help address the current teacher shortages.

However, there are also concerns that national registration should not come at the expense of lowering of current standards and requirements and that it is the current regulatory authorities, the Teacher Registration Authorities in each state and territory, that must maintain oversight and maintenance of teacher registration.

9. COLLECTING DATA TO INFORM DECISION-MAKING AND BOOST STUDENT OUTCOMES

ISA's view of collecting data to inform decision-making and boost student outcomes in relation to the NSRA is that reducing and focusing on key measures may provide more targeted and relevant information to Ministers, the school sectors, and the public. To this end, consideration should be given to targeting available evaluation measures to specific reforms to better align with, and measure, the intent of the reforms.

However, 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.

The creation and implementation of new national data collections and measures, such as for student wellbeing, poses significant challenges for the Independent sector, with the reporting burden on schools and systems already considerable. The Independent sector is largely non-systemic and does not have centralised system supports meaning that any new additional reporting burden falls directly onto schools. ISA would support using existing data collections where possible and any additional reporting should not place further administrative burden on schools.

New or additional reporting requirements also require significant lead times and, in some cases, assistance, such as the provision of reporting portals and forms and templates. The diversity of the sector also means that the capacity and capability to change collection mechanisms, to adopt new collection methodologies and to implement school-wide change in individual schools varies widely.

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.

Independent schools already have a significant reporting regime that they must meet that includes students, schools, staff, attendance, financial and also parental data. Students with Disability (SWD) are already the focus of a significant data collection – the Nationally Consistent Collection of Data on School Students with Disability – which is a significant undertaking for teachers and other school

staff to complete each year as part of the Non-Government School Census. To further increase the data collected on SWD would impose a significant additional burden on schools and school staff. It also not yet been sufficiently demonstrated that increased data measurement and reporting on outcomes of Students with Disability would improve outcomes for those students.

In relation to the need for longitudinal data to identify the actual students at risk of falling behind based on their performance and to monitor these students' progress over time, it is not clear how this could be achieved without the both the implementation of the USI and a national agreement to use the USI beyond the current agreed use case which is limited to student transfers. ISA has also noted many times that the implementation of the USI across all sectors will require significant investment by all governments to ensure that all sectors of education are able to participate without an undue administrative burden falling on individual schools and school administrators.

Similarly, a proposal for a single agency to collect and hold school related data, nationally and across jurisdictions would need to be supported by all jurisdictions and sectors and may not be seen as the best use of public funds. Potentially, further work on enhancing collaborative analysis of key issues in schooling could be progressed through existing bodies such as AERO, however activity of this type would need to be sufficiently resourced.

ISA is also concerned that a narrow focus on data collection will not create widespread improvements and rather that more reporting will lead to more school comparisons and school rankings such as now occur with NAPLAN. Rather, what is required to improve student outcomes is localised approaches to benefit students in their own contexts. The diversity of both students and school contexts means that what works in one context may not work in another. What is required is a focus on efforts to address student needs, identify learning gaps and provide individualised support.

As Geoff Masters writes in the 2022 publication, *Reform Challenges in School Education* in relation to high performing systems.

> "*Student-centred approaches to teaching and learning recognise that students come from widely varying cultural, language, socio-economic and other backgrounds, have very different interests and aspirations, and are at markedly different stages in their learning and development. Success in ensuring every student learns successfully depends on understanding and addressing individual circumstances and needs. This is also the key to equity in school education.*"[23]

In order to achieve a "better and fairer education system" we need a student-centred approach rather than a data-driven approach. A student-centred approach would prioritise early intervention plus targeted support in order to bridge the learning gap for students. The sooner learning gaps are identified and supported, the better the educational outcomes a student will have.

10. FUNDING, TRANSPARENCY AND ACCOUNTABILITY

Independent schools range from high fee metropolitan schools, a small part of the sector, through to suburban low fee schools and schools serving highly disadvantaged communities which have no capacity to charge fees, such as our Aboriginal and Torres Strait Islander community schools.

Since the 1970s, Australian Governments have supported choice in schooling by providing public funding to non-government schools as a way of ensuring that all schools have at least a minimum level of facilities and resources. This has always been expressed through a per student funding entitlement recognising every child's right to receive a contribution from government towards their education.

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[23] Geoff Masters, Reform Challenges in School Education, 2022, p23, https://isa.edu.au/documents/reform-challenges-in-school-education/

And while the Independent sector is highly diverse, we do know that on average Independent schools receive most of their funding from parents; over half their recurrent funding and around 90 per cent of capital funding. The remaining funding for Independent schools comes from governments, the majority from the Australian Government but also from state and territory governments.

In government schools it is the state and territory governments which provide the majority of school funding with the Australian Government the minority funder.

The current needs-based Schooling Resource Standard (SRS) funding model comprises a base amount for every student and loadings to address disadvantage for both students and schools. The aim of the model, developed as an outcome of the 2011 Review of Funding for Schooling (the Gonski Review), is to ensure that every student, regardless of their background or circumstances, can access a high-quality education.

Each successive funding model has included a methodology to reduce the funding that goes to schools proportionate to the wealth of the school or the school community. Under the current SRS funding model, base funding is reduced in line with parents' capacity to contribute measured directly through parents' income tax. returns This means that those with the capacity to pay more receive the least amount of government funding.

The SRS funding model for all schools is still in the implementation phase and all non-government schools will be funded at their SRS entitlement in 2029. According to the Department of Education's data, under current funding arrangements, in 2023 around 40 per cent of all non-government schools are funded above their SRS in 2023. In the Independent school sector specifically, only 367 schools, around 30 per cent of our sector are still transitioning down to their SRS entitlement by 2029.

The transition arrangements have enabled schools that were entitled to more funding under the previous SES funding arrangements to plan a sustainable transition to their new funding entitlement and ensuring that no school had to close as a result of the introduction of a new funding model.

TRANSPARENCY AND ACCOUNTABILITY

Independent schools are the most accountable schools in all sectors of education. Independent schools are bound by a range of legal requirements associated with their educational and financial operations and must comply with both Australian Government and state and territory government regulations and accountability requirements.

All Independent schools, regardless of teaching philosophy, faith affiliation, location or the socio-economic status of their students, must be registered by state and territory authorities to operate. Without registration, schools may not operate. Registration is regularly reviewed to ensure that schools maintain appropriate standards and meet staffing, facilities, environment, management, curriculum and reporting requirements.

To receive Australian Government funding, Independent schools must be not-for-profit institutions, as per Sections 75 and 76 of the Australian Education Act 2013. As companies limited by guarantee or registered charities, they are accountable to the Australian Securities and Investments Commission, the Australian Taxation Office and the Australian Charities and Not-for-profits Commission. This includes the annual provision and publication of financial data on the ACNC website.

As not-for-profit entities, Independent schools do not make 'profits'. Any surplus must be reinvested into the school and cannot be dispersed as 'profit-taking' the way that corporate organisations can, where shareholders may receive a share of profits.

Independent schools must demonstrate that the funds they receive from government have been expended appropriately and provide relevant financial data to the Australian Government Department of Education, through the Financial Questionnaire, which includes the provision of audited accounts, and a financial acquittal certificate.

Independent sector systems are also required to publish their needs-based funding model and provide a Block Allocation Summary to the Australian Government detailing the distribution of funding to individual schools as part of their Financial Accountability requirements.

A significant amount of information about individual Independent schools, and the Independent sector more broadly, is publicly available on the My School website, on the Australian Charities and Not-for-profits Commission website, in annual Australian Bureau of Statistics reporting, or in the Annual Report on Schooling.

As employers, Independent schools must comply with legislation and regulations covering such issues as equal employment opportunity, industrial awards and work health and safety, and as educational institutions, they must observe health, safety, privacy and child protection requirements as well as regulations relating to building and fire codes.

At the individual school level, Independent schools are set up and governed on an individual school basis, connected directly to their community and answerable to their own governing board or management committee. Schools are required to make their annual report publicly available to their school community, usually through publication on the school website.

Further to government requirements, Independent schools would also argue that the freedom of students and their families to exercise choice in schooling is perhaps one of the most demanding forms of accountability for Independent schools. Independent schools strive to consistently meet high parental expectations.

Any additional accountability measures for schools would also incur an additional workload and cost for individual schools on top of what is already a significant accountability and reporting regime that schools have to comply with at multiple levels of government and across a range of areas.

NEEDS BASED FUNDING

As ISA noted in our submission to the National School Resourcing Board (NSRB) Review of needs-based funding requirements,

"The majority of schools in the Independent sector are stand-alone schools that receive their Australian Government funding directly from the government with no capacity for reallocation or redistribution across schools. These schools are therefore directly funded in accordance with the Australian Government's needs-based funding arrangements, thus meeting the Act's objectives of fairness, transparency and allocation according to need."

As the table below illustrates, for stand-alone Independent schools, the level of Australian Government funding is highest for schools serving the most disadvantaged students, reducing to the lowest level of funding for the schools serving the least disadvantaged students. This is also true for systemic Independent schools, demonstrating that Independent schools, regardless of their systemic status, distribute funding consistently with the Australian Government needs based funding model.

Table X: Distribution of Australian Government recurrent funding to the Independent sector by CTC score and systemic status, 2022
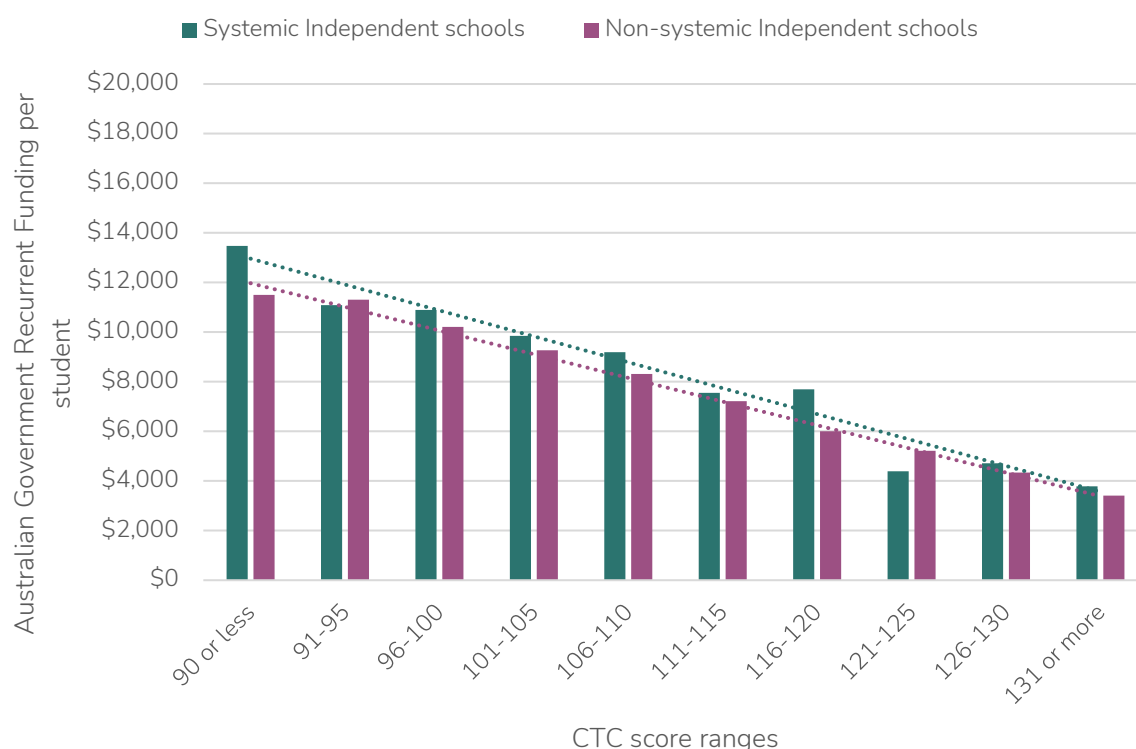
Source: ACARA My School

The 2020-21 Australian National Audit Office (ANAO) report, *Monitoring the Impact of Government School Funding*, found that

> *"The department's activities to gain assurance in the allocation and use of school funding are largely effective. The department has effective mechanisms in place to ensure the accuracy of funding allocations."*

The ANAO's report does however, go on to note that the Department of Education's implementation of the recommendations of the NSRB Review of the needs-based funding arrangements to improve transparency has not yet taken place and this is still the case.

LINKING FUNDING TO OUTCOMES

As noted previously, ISA is concerned that the focus on reporting and data collection in this review could result in a data-driven approach to schooling rather than a student-centred approach. There are also a range of concerns that means creating reporting systems to link individual funding dollars to student outcomes is highly problematic, particularly when the focus should be on supporting schools, teachers and students.

It is also perhaps not well understood that under the current funding model, a school's funding entitlement is the total of its base plus loadings and schools are not required to use the funds for specific uses beyond the requirement that funding must be used "for the purpose of providing school education at a school for which the approved authority is approved".[24]

As ISA noted in our submission to the NSRB's Review of needs-based funding requirements,

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[24] Section 29, Australian Education Regulation 2023, https://www.legislation.gov.au/Details/F2023L01020

> *"In considering the level of flexibility with respect to base funding and loadings, it should be noted that a school's SRS entitlement is the total of its base funding and loadings. There is no requirement under the Act that the constituent elements of a school's SRS entitlement be considered separately.... It is not the intention that a particular loading or portion of a loading be attached to a particular student. Changing this would present difficulties for schools in budgeting and monitoring expenditure and diminish scope for efficiencies and economies of scale."*

The flexibility referred to above is critical for schools where the balance of base funding and loadings is such that loadings are used to pay teacher salaries and other general recurrent costs. This is not uncommon in schools which are dealing with both high levels of student disadvantage and whose staffing needs are high, and schools dealing with either the challenges of being a small school and thus lacking economies of scale and / or are located in regional and remote areas where the cost of the provision of education is high. In practise, this means that it would not be reasonable to link school funding allocations to individual students and individual student outcomes.

11. CONCLUSION

The Independent sector is a key part of Australia's schooling and educates a diverse and growing component of the school age population. One in six students attends an Independent school and one in eight schools is an Independent school.

ISA believes that there is value in articulating a national policy agenda that drives national improvement and reform – to deliver a "better and fairer education system". However, it must also be recognised that all sectors of schooling have much to contribute to this endeavour.

The Independent sector, through individual Independent schools and AISs, are already engaged in the key reform areas through the provision of innovative programs and initiatives.

ISA supports the proposed focus on improving student outcomes, particularly for disadvantaged students, improving student mental health and wellbeing, and addressing the workforce challenges in schools.

However, there is a danger that the emphasis on a national data-driven approach through increased data collection, target-setting and measurement of outcomes will distract from a student-centred approach to the delivery of education at the local level, which is what is required to address the challenges facing schooling today and to create equitable and high performing schooling.

To this end, all sectors of education must be supported to enable successful implementation of national education reform.

12. RECOMMENDATIONS

ISA makes the following recommendations in relation to this Review.

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

— Any measures to address barriers for the identified priority cohorts must be cross sectoral so that there is parity and equitable access to reforms and initiatives for students.

— Any targets in the NSRA must be reasonable and achievable for all schools and sectors and should build on existing evidence. For this reason, ISA recommends a separate process to this Review.

— Any reporting against targets to measure the outcomes of schooling in relation to the next NSRA should not impose an unreasonable burden on schools and/or result in a highly data-driven approach to education.

— The primary focus should be on what supports schools put in place to support students, more than targets.

Improving student mental health and wellbeing

— Independent schools would welcome an explicit focus on student, staff and school leaders' mental health and wellbeing in the next 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 Review should consider the value and feasibility of the inclusion of a wellbeing target in the next NSRA as it is not possible to define optimal wellbeing, which makes including a wellbeing target in the NSRA highly problematic.

Our current and future teachers

— ISA recommends that the Review note and support the current work underway in the NTWAP and ITE processes and limit recommendations regarding teachers to those that sit outside current work streams.

Collecting Data to inform decision making and boost student outcomes

— The Review should consider the possible targeting of available evaluation measures to specific reforms to better align with, and measure, the intent of the reforms.

— There must 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.

— Any new data collections must take into account the administrative and resourcing burden on individual schools, sectors and jurisdictions.

Funding transparency and accountability

— The Review should recognise that the SRS funding model was based on the principles of subsidiarity and flexibility, with the acknowledgement that schools are best placed to know and meet the needs of their students.

— The Review should acknowledge that schools are best placed to know and to meet the needs of their students, and therefore reporting at the individual school level against specific loadings is not appropriate.

APPENDIX A - INDEPENDENT SECTOR CASE STUDIES

IMPLEMENTING GENERATIVE AI – HILLBROOK ANGLICAN COLLEGE[25]

Hillbrook Anglican School has experienced significant growth over the last five years and will be at capacity in 2024 with 900 students from years 7 – 12. As an Independent school they have the autonomy to adapt to change and plan according to the needs of the Hillbrook community. They have an open, inclusive and collaborative environment that fosters inquiry, innovation and creativity.

The school's engagement with AI and perspectives of staff, students and parents

Although generative AI is now easily accessible, many teachers, parents and students remain unaware of the various ways it can be both utilised and misused.

Principal Maria Woods and Ms Miriam Scott, Head of Digital Education attended a ChatGPT conference which was largely targeted to industry. Although there were few educators at the conference, they were inspired by this experience and decided to host their own conference in May, which attracted over 200 participants, including students, Ministers, teachers, and industry specialists. The conference served as a platform to address the need for more information in generative AI and possible applications for education.

Following the conference, some students prepared a business report and presented it to the Principal, demonstrating how generative AI could be integrated into the school's practices. As students are well informed and involved, if they misuse AI, they do so with awareness of consequences, making conscious choices.

Ethical considerations

Over the past six years, Ms Scott has developed the Digital Access Pass (Digital Access Pass | Be better.), a resource influenced by student input, designed to connect and provide students with the knowledge and ethical mindset to approach generative AI with integrity and safety.

Given the ever-evolving nature of digital technologies, teachers have received professional development so they can explicitly teach students how to make informed choices regarding the use of assistive technology such as generative AI within clear school guidelines. Teachers at Hillbrook have been encouraged to familiarise themselves with the technology of generative AI, explore its potential within assessments and lesson planning, and be creative.

Both teachers and students are taught how to effectively use prompts, establishing example banks for teachers and students and creating spaces where teachers can share resources. This collaborative effort presents a great opportunity for teachers to work together with a growth mindset.

Implementation

Ms Scott is confidently guiding and supporting the school's journey into generative AI territory. Hillbrook has also been proactive in supporting other schools, sharing their practices, and providing support to those seeking advice. The ever-evolving nature of the AI landscape necessitates continuous evaluation and adaptation therefore teachers receive guidance on how to effectively implement AI, understanding what is permissible and what is not.

A significant professional development initiative has been implemented for all teachers at Hillbrook to showcase their use of generative AI. Recognising the importance of valuing teacher involvement in exploring the potential opportunities and challenges of generative AI in education, the school has provided dedicated time for education and implementation of AI tools, such as ChatGPT.

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[25] ISA Submission to the House of Representatives Standing Committee on Employment, Education and Training Inquiry into the use of generative artificial intelligence in the Australian education system, https://isa.edu.au/documents/submission-the-issues-and-opportunities-presented-by-generative-ai/

An action research team focused on AI, comprising members from various subject areas, has been formed to explore different approaches, including adjustments to assessment and curriculum.

The school has also conducted a series of lessons to students to address expectations about the ethical use of generative AI as in this example for Year 12 students https://youtu.be/P4givEF6BTo.

Challenges and opportunities

While Turnitin, a plagiarism checker, is trusted by teachers, its current accuracy in assessing generative AI output is limited. It serves as a starting point for investigations, but additional tools and assessments are required.

Given the constant evolution of technology, students need to make informed choices. They often feel uncertain about what they can and cannot do and need clarity. It is therefore crucial to educate teachers and students about the specific assistive technologies that students can use for particular tasks.

Challenges:

- The potential for abuse by students; if they are not taught how to use it appropriately, they will push boundaries.

- Generative AI is about to be embedded across everything, e.g., Google for Education for AI, but will only be released for teachers (18+ only). Microsoft is doing something similar.

- Teaching students the appropriate way to use generative AI, supporting them through this transition.

- Overcoming fear and confusion about what generative AI really is, with high resistance from some teachers.

- The need for schools to provide extensive support to future skill staff.

- Teacher workload, time and resources required to integrate AI into their work. Teachers are the gatekeepers to students, so supporting them is crucial.

- Knowing the difference between AGI (Artificial General Intelligence) and generative AI.

- Current technology divide is growing and becoming more significant. Every technology has pros and cons.

Opportunities:

- Personalised student tutoring and differentiation tools could be facilitated through creating tutoring services accessible to anyone with internet access.

- Government grants could be offered to make these services accessible.

- Teacher collaboration, where teachers support each other with the backing and support of schools and peak bodies.

- Use of generative AI could reduce teacher workload.

Future impact of AI
Generative AI could provide an opportunity to enhance learning and assessment for students and support teacher workload.

Generative AI can be a catalyst for change and improvement if implemented properly, leading to the next evolution of education. This change will be driven not solely by generative AI but by the conversations we have, and the people involved.

Resources

Hillbrook Anglican School has provided the following resources for public viewing.

- Year 12 AI information session video: https://youtu.be/P4givEF6BTo

- AI in Education Miriam Scott's website for teachers: https://scottybreaksitdown.com/ai/

- Digital Access Pass website – https://digitalaccesspass.com.au/
- As a result of an Independent Schools Queensland grant, they also developed three parent courses. See https://digitalaccesspass.com.au/courses/chatgpt-in-education/

IMPROVING OUTCOMES FOR ABORIGINAL AND TORRES STRAIT ISLANDER BOARDING STUDENTS - AISWA FUTURE FOOTPRINTS

The Future Footprints program is an initiative of AISWA that began in 2004. The program supports Aboriginal and Torres Strait Islander students who have chosen to attend one of the 20 participating schools in Perth.

The primary goal of the program is to ensure positive engagement of Aboriginal and Torres Strait Islander students with the education system, to enhance their sense of belonging and self-worth within the education system, and provide students with the confidence, knowledge and skills to succeed. Future Footprints is based on an Aboriginal Family Model, of peer support and leadership.

Future Footprints is a well-established partnership between students, schools, parents, communities, and sponsors. The broad aim of the program is to improve educational outcomes for Aboriginal and Torres Strait Islander students, and enhance their opportunities post-school to further education, training, and/or employment.

The Future Footprints Program Overview notes that

"It is not intended to replace existing transition support provided by participating members schools but rather to compliment them. The provision of support services is multifaceted, and this next section aims to provide a brief overview of the levels and type of support services Future Footprints offers. Given the breadth of transition support work undertaken by Future Footprints, it has historically embraced a systems level approach embedded around an Aboriginal family model to providing support to students, schools, parents and families."[26]

Each year Future Footprints coordinates a number of initiatives and events that bring together Aboriginal and Torres Strait Islander students from participating schools. Future Footprints has also assisted schools in establishing their own school-based programs, which form an important part of the schools' culture and foster great pride within the Independent School community.

In 2023, the Future Footprints program

- involved 20 schools,

- supported 35 school coordinators, and

- supported 544 Aboriginal and Torres Strait Islander students.

https://www.ais.wa.edu.au/future-footprints-program

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[26] https://www.ais.wa.edu.au/aiswa_page_files_download/338873

IMPROVING OUTCOMES FOR DISENGAGED STUDENTS – HESTER HORNBROOK ACADEMY, VIC[27]

Hester Hornbrook Academy has three campuses, Sunshine, Melbourne CBD and Prahran with a South Melbourne campus opening in 2023. Total school enrolments over the three campuses are 378 with 90 staff. Wellbeing and education sit side by side and wellbeing is seen as everyone's responsibility. The school aims to reduce barriers to education for young people, providing positive education experiences through their Healing Oriented Program of Education (HOPE). This vision is supported by a strong team approach with a youth worker in every class so there is always someone to listen to and support each student.

Hester Hornbrook's vision doesn't stop at graduation. In the first-year post-school, youth worker support is continued, especially in mental health, housing and finding employment. This valuable long-term support for Hester Hornbrook alumni is offered for seven years.

Impressions

The Sunshine Campus of Hester Hornbrook is situated in an industrial area and looks like a shop front, but once through the main door, you enter a unique environment. The school has been thoughtfully planned with a trauma-informed lens so there are no institution-like long corridors or hallways. The space is welcoming, with busy productive areas and quiet, cosy inviting seating areas. Soft pastel colours have been selected to create a safe, calm feeling. There are no uniforms or bells, and the atmosphere feels very different from a mainstream school.

Staff are strongly aligned with the school's vision to make a difference for disengaged youth. The focus on staff wellbeing pays dividends as they love working at Hester Hornbrook. Staff feel supported with regular wellbeing check-ins and access to external confidential counselling services.

The high level of staff collaboration is impressive and with students commencing school at 10am, staff have essential time for daily meetings to discuss programs and provide feedback and ensure there is appropriate wrap around individual support for each student.

Wrap around care

Hester Hornbrook is more than a school; it is a community hub. Young mums can bring their babies to class, students can do their washing, have a shower, take home evening meals and be linked with appropriate external support agencies. Breakfast and lunch are provided daily, and every student is given a Myki card to access free transport to school.

Student mental health and wellbeing is prioritised, and youth workers create strong, respectful, positive relationships and arrange access to external agencies according to individual student need. The school has access to a range of specialised support such as psychologists, occupational therapists, lawyers, drug and alcohol support, nurses, health or housing services.

Unique Programs

The unique, flexible learning programs at Hester Hornbrook are designed to allow students to experience success. All VET courses are delivered at school so that full wrap-around support can be provided.

The Young Parents Program is available to students expecting a child or with a child up to 18 months old. They attend school 2 days per week with their child in the classroom and study their Vocational Education Training (VET) course once per week. Youth workers support access to childcare for VET days. The Young Parents classroom is unique with learning areas, tables, white board, highchairs, baby toys and cots.

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[27] Independent Schools Australia, Special Assistance Schools: Showcase, 2023, https://isa.edu.au/wp-content/uploads/2023/04/ISA-Special-Assistance-School-Showcase.pdf

Outreach programs are available for students unable to attend school. Teachers and youth workers visit students offsite to deliver the education and wellbeing programs, with a strong focus on individualised learning needs.

The Engage Youth is a program for long term disengaged students who have not attended school for more than ten weeks. They commence school initially two days per week to build confidence and capacity and attendance increases accordingly.

The Living Learning Program in partnership with Melbourne City Mission is a 3-year community-based program for young people aged 15-21 years with a mental health condition. This program provides mental health and wellbeing support as well as a physical health program with access to youth workers and specialist education support to ensure everyone can finish school.

IMPROVING OUTCOMES FOR ABORIGINAL AND TORRES STRAIT ISLANDER STUDENTS - AISNSW WARATAH PROGRAM

The Waratah Project supports participating schools to develop and implement strategies to improve literacy, numeracy and other academic outcomes of their Aboriginal and Torres Strait Islander students, including initiatives to support wellbeing and strengthen relationships with students' families and communities. Using a proven 'hub and spoke' model, six networks of schools operate across NSW, each with a designated hub school leading the network. These networks allow participants to learn from and with each other, leveraging opportunities for professional learning and collaboration. Each participating school uses The Waratah Outcomes Framework as the basis for community consultation to identify priority areas relevant for their context and Aboriginal and Torres Strait Islander student cohort. Each school then developed a detailed Action Plan – outlining the priorities for that school as part of this project, strategies, and activities to be implemented, and success criteria.

In 2022, all participating schools prioritised improving Aboriginal and Torres Strait Islander students' literacy, numeracy, and other academic outcomes. They approached this by collaborating with students, family members/carers and a wide range of specialist staff to develop individualised learning support. Using Personalised Learning Plans, specialised literacy and numeracy programs and target literacy and numeracy support in and outside of class time. In addition to literacy, numeracy and other academic outcomes, project schools demonstrated progress towards other outcomes for Aboriginal and Torres Strait Islander students. A focus for many project schools was improving students' transition experiences into the school and boarding environment, with schools implementing a wide range of transition programs and activities. These included school staff visits to students' home school, family and community prior to commencement, as well as student and family visits to the school, Orientation events, regular communication and support to families and the completion of student profiles and learning plans. Some schools also focused on supporting students' transition out of school to future education and employment opportunities by connecting students with education and employment providers. Schools also implemented targeted support for Aboriginal and Torres Strait Islander student health and wellbeing including appointments with school-based and external health professionals such as counsellors, child psychologists, dentists, optometrists, dieticians, and paediatricians.

Throughout 2022, all 30 participating schools met each term to learn from and with each other and to collaborate in professional learning. These termly meetings of participating schools evolved in 2022 from a 1-day event to a 2-day event in response to feedback from schools, to include professional learning and On-Country cultural immersion opportunities in partnership with local Aboriginal communities. In response to feedback from participating schools and following the separation created due to COVID restrictions in 2020 and 2021, Waratah Project termly meetings in 2022 began to be hosted by participating schools. Three meetings were held in the regional locations of Dubbo, Coffs Harbour and Kempsey, enabling urban schools to gain a greater understanding of the context and challenges of regional communities and education for Aboriginal students and communities.

Strengthening the professional learning, support and cultural responsiveness of participating schools was the core focus for 2022 Waratah Project meetings. Focus of meetings during 2022 included:

Strategic planning and data identification process support provided to all participating schools, with significant time provided for schools to strengthen their understanding of using Aboriginal and Torres Strait Islander student, parent/carer and community voice to inform cultural safety and inclusive schooling practices.

Hub and Spoke school sharing of successful strategies, areas of concern and identifying opportunities for collaboration.

Guest speakers from Charles Sturt University, Gumbaynggirr Giingana Freedom School, Kinchela Boys Home, Bennelong Energy Services and AISNSW Aboriginal Education Specialists. Guest speakers provided opportunities for participating schools to develop a greater understanding of

engaging Aboriginal and Torres Strait Islander students through a cultural lens, strengthening multitiered approaches in numeracy, building authentic partnerships with Aboriginal parents/carers, trauma and intergenerational trauma in Aboriginal communities, defining post-school pathways for Aboriginal and Torres Strait Islander students and creating study pathways for Aboriginal staff.

On-Country learning provided participating schools the opportunity to engage and learn directly from Aboriginal Elders and Knowledge Holders. This resulted in schools increasing their cultural responsiveness, partnerships with their local Aboriginal community and cultural knowledge to embed within the classroom.

In 2022, individual school reports demonstrated that the Waratah Project is achieving real impact for Aboriginal and Torres Strait Islander students in participating schools including:

St Joseph's College, Hunters Hill collaborated and developed a whole school approach to embedding Aboriginal and Torres Strait Islander histories and cultures in all areas of the curriculum through the Indigenous Culture in Curriculum Week. This week, held in March of 2022, requires all teachers to actively engage with Aboriginal and Torres Strait Islander histories and cultures in every class across each year of learning. Teachers are provided with cultural support and feedback during the planning phase leading into the week. Indigenous Students Program Coordinator reported "Embedding and celebrating Aboriginal and Torres Strait Islander voice and perspective into the curriculum ensures that our students expand their cultural awareness and understanding of our nation's history. A Year 12 Aboriginal student commented, "This week means a lot to me personally. It makes me feel proud of my culture."

The Hub and Spoke model aims to create an environment of collaboration and sharing of education context to enable learning and partnerships across the participating schools. The five schools in the St Andrew's Cathedral School network travelled to each other's school during 2022, holding mini-conferences in each location to provide greater insights into the school community and connect teachers across schools. The Head of St Andrew's Cathedral Gawura School reported the impact of collaborating across schools; "As a Hub School leader we have engaged with 4 other regional schools in northwestern NSW and have developed a marvellous connection with each one...It is a highlight when we can meet together, and each school hosts a mini road show of professional development and cultural learning. Each Hub school enjoys visiting each other to see the initiatives that have been implemented within their own school contexts".

All schools reported maintaining a strong focus on literacy and numeracy support strategies, interventions and achievement of Aboriginal and Torres Strait Islander students. From the 30 participating schools, 18 schools reported that they were confident in their strategies and identified they were meeting this outcome area. This was reflected through their range of strategies implemented to support their Aboriginal and Torres Strait Islander students from a strength's basis, including:

Personalised Learning Plans

Individual academic support

Employment and training of Aboriginal Mentors and Support Officers

Formalised assessments, i.e., PAT (literacy/numeracy), NAPLAN analysis, WISC/WIAT

Implementation of a tiered literacy and numeracy intervention strategies

Homework and tutoring programs

The remaining 12 schools identified they were confidently working towards literacy and numeracy strategies that were generating impact for their Aboriginal and Torres Strait Islander students.

In Term 4 2022, five new schools were invited to join the project from 2023. A whole day orientation for these five new schools was held in November 2022, where school teams, including the Principal, gathered in Port Macquarie to gain an understanding of the background to the Waratah Project and an introduction to the Waratah Framework. The day included focused sessions on strategic planning, collecting baseline data from a variety of sources, creating collaborative partnerships between the five schools, and expectations of school engagement throughout the Project. For the first time, the

2022 orientation day was held face-to-face (due to COVID restrictions in previous years these sessions had only been held via video link). Schools connecting in person for the first time and learning together had a dramatic positive impact on engagement. We were also joined at the meeting by the Deputy Director of the Association of Independent Schools of Northern Territory, where there is a joint interest in working together across both jurisdictions, sharing the success of the Waratah Framework beyond NSW.

In 2022, a new external evaluation partner for the Waratah Project was identified to bring an objective lens to the evaluation for the period 2023 to 2025. Yulang Indigenous Evaluation is an Aboriginal-led consultancy and evaluation business that works to research and evaluate policies and programs using the Ngaa-bi-nya framework which provides a culturally appropriate rubric to determine impact. AISNSW, participating schools and Yulang work together to make sure the Waratah Project continues to meet the needs of participating schools so they can best support improved outcomes for their Aboriginal and Torres Strait Islander students.

ADDRESSING MENTAL HEALTH AND WELLBEING - AISSA WELLBEING TOOLKIT

In 2022 the Student Mental Health and Wellbeing Taskforce, comprising principals, Professor Donna Cross and staff of The Association of Independent Schools of South Australia (AISSA) was established by the AISSA's Chief Executive. The work of the Taskforce led to the development of the AISSA Wellbeing Toolkit, focusing on a universal wellbeing promotion and an early intervention approach. The Taskforce recognised that schools play a powerful role, and the most important approach is to prevent, protect and to promote mental health and wellbeing, and that it is everyone's responsibility, every day.

Supporting positive mental health and wellbeing is complex and ongoing. Developing young people's academic social and emotional and behavioural capabilities is highly dependent on skilled, competent and dedicated school staff (Cross, 2023). The AISSA undertakes an integral role in support of this and it is only through the provision of government funding that this can be achieved.

The Toolkit assists schools to strengthen both practice and pedagogy for whole school wellbeing within their own context. It includes evidence-based resources to build school staff capacity to best support student and staff wellbeing through a whole school lens. The building of leadership capacity to drive implementation and sustainability at the school level is a key priority.

At the heart of the Toolkit sits a visual representation detailing the centrality of student, staff and leadership wellbeing, surrounded by key attributes, actions and ways of working. A three-tiered approach to whole-school wellbeing delivery provides the structure for action at the individual school level through audit, assessment, review, and development of the key elements of the school's current and future wellbeing programs.

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The Wellbeing Toolkit is being shared with other education sectors in South Australia and across the Independent sector nationally. Complementing this important work, the SA Independent sector Wellbeing Coordinator Network remains an important priority for AISSA and supports school staff to build capacity and remain abreast of the latest evidence and tools so they can apply practical evidence-based strategies to deepen understanding and improve outcomes.

OUR CURRENT AND FUTURE TEACHERS - AISNSW TEACHING SCHOOL HUBS (GROWING AND NURTURING EDUCATORS)

The Teaching School Hubs is a three-year pilot program for initial teacher education students employed in independent schools while undertaking their studies. The program aims to strengthen outcomes for schools by providing opportunities for each initial teacher education student to regularly apply initial teacher education (ITE) learning in an authentic, immersive school environment while completing their formal qualifications and receiving relevant complementary learning through AISNSW.

The purpose of the program is to support the development of 'classroom-ready' initial teacher education graduates, improve retention of new graduate teachers, and support schools to develop a stable, high quality teacher pipeline. The pilot will also benefit existing teaching staff as they engage with and support preservice teachers in their school. The longer-term goal is to address the ongoing teacher shortage through establishment of an employment-based model to improve the attraction, training, induction, and retention of high-quality teachers.

Three Teaching School Hubs were established in late 2022, comprising 10 schools in NSW and an eleventh school in South Australia. AISNSW actively sought to engage schools that reflect the diversity of the independent schools' sector.

South-west Sydney hub (three schools)

Two Islamic schools and one Special Assistance school (with initial teacher education students working across two campuses).

North Coast NSW hub (six schools)

A Special Assistance School (Coffs Harbour), a Steiner School (Mullumbimby), three Anglican Schools (Terranora, Coffs Harbour, Grafton) and a school designed around a progressive learning environment (Lismore).

Virtual hub (two schools)

One school located in Dubbo with a focus on supporting high potential local students through a focus on 21st century skills. The second school is located in Adelaide.

Each initial teacher education student was assigned a Mentor Teacher from the school where they are employed who will support them through the program and the completion of their teaching qualification while they also learn on the job. Mentor Teachers model exemplar teaching, encourage their initial teacher education student to engage in deep reflection of their teaching practice and provides guidance in the practical application of ITE theory. As part of the Teaching School Hubs Project, AISNSW provides regular professional learning to these mentors, to help them support their assigned mentee. The first two-day professional learning session was held in late 2022 and was attended by 23 Mentor Teachers and eight Hub School Coordinators (school leaders overseeing the pilot in their school/campus).

As part of the Teaching School Hubs Project, AISNSW provides professional learning for initial teacher education students that complements the ITE course content they are learning through their higher education provider, and which helps students apply their learning in their school contexts.

https://www.aisnsw.edu.au/teachers-and-staff/research-and-data-in-schools/the-evidence-institute/growing-and-nurturing-educators