OCHRE EDUCATION

www.ochre.org.au
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September 2025
Productivity Commission Interim Report Building a skilled and adaptable workforce

To Whom It May Concern,

Thank you for accepting this submission on the Productivity Commission's (PC) interim report on Building a skilled and adaptable workforce.

We were grateful for the opportunity to engage with the Productivity Commission on this issue with you during the consultation phase, and encouraged to see reference to the work of Ochre Education and the strong interest in the benefits of a national bank of curriculum supports for teachers in your draft Recommendation 1.1.

In this submission we seek to provide further information in relation to our work and its impact, and the strong alignment with draft Recommendation 1.1. proposed. Specifically, we note the scale and fully sequenced nature of Ochre's materials. We describe how the current report underemphasises the critical nature of this sequencing, in particular in relation to the proposed assessment process for quality. The fully sequenced nature of curriculum materials is key to supporting a skilled and adaptable workforce. This needs to be clearer in the report if teachers and students are to benefit from the productivity dividend of fully sequenced, high-quality materials.

This submission also describes how Recommendation 1.1 as it currently stands implies that a government agency should lead the development of the national bank. This submission argues that the report should make clearer to Ministers the challenges of governments performing this role, and explains why Recommendation 1.1. should be amended to clarify that in establishing a national bank of curriculum materials the Australian Government's investment should be in a high-quality curriculum provider, like Ochre, which is independent from government.

Our submission comprises:

- **Section 1:** About Ochre Education and our work to date in developing an independent national platform for all teachers to access curriculum materials.
- **Section 2:** Comments on the Productivity Report's draft recommendation 1.1 (a national platform for lesson planning materials).
- **Section 3:** Ochre's alternative recommendation to Invest in a single national independent platform for all teachers to access curriculum materials.
- **Section 4:** Brief comments on draft recommendation 1.2 (educational technology and artificial intelligence in schools).

We would be happy to discuss any aspect of our submission with you further, should you have any questions.

Kind regards

Reid Smith and Caroline Reed
Co-CEOs
Ochre Education

1. Section 1: About Ochre Education and our work to date in developing a national platform for all teachers to access curriculum materials

Ochre Education was established in 2021 as an innovative not-for-profit organisation, to improve student outcomes and close the disadvantage gap by supporting teachers to teach, and to enable all students to access, a high-quality curriculum everywhere.

We achieve this by working with schools, teachers and the wider education system to develop and support the use of an expertly-sequenced curriculum, alongside a comprehensive bank of free, quality-assured, curriculum-linked teaching resources, to be adapted and used by any teacher anywhere through a robust, accessible digital education platform. Our approach is deliberately sector-led, with teachers, subject experts, and schools directly involved in co-design and co-development, user-testing, and refinement of all of our materials.

Through this we are:

- Sharing the brilliance of expert teachers across the country;
- Providing high-quality, optional, evidence-based curriculum and instructional materials designed to be easily adaptable through teachers' professional judgement to meet varied learning needs and contexts. Supporting teacher professionalism in the important role all teachers play in planning education, tailoring curriculum resources to the specific context of their school and students;
- Making high-quality, sequenced curriculum accessible and easy to find, reducing inefficient workload and enabling teachers to focus on the job of teaching. Freeing up teachers to focus on the needs of students in their classes, rather than searching for, verifying and then adapting resources;
- Enabling all students to benefit from high-quality lesson resources and effective evidence-based instruction, in particular supporting teachers working in disadvantaged and non-metropolitan schools (which are more likely to experience insufficient or poor-quality curriculum resources than advantaged or metropolitan peers, as well as less stable, qualified and experienced staff);
- Supporting strengthened leader and teacher capability in curriculum design, inspiring teachers to plan and think about their own curriculum and lesson planning, including better supporting teachers through curriculum changes; and
- Supporting teacher professional development through the creation of our materials, and through their use as practical exemplars of evidence-based approaches to curriculum design and implementation, instructional practices and subject-specific knowledge.

We were inspired by the UK's hugely impactful Oak National Academy, which was launched as an online resource for teachers during the initial COVID school closures, and has recently been launched as a Government arm's length body.

Ochre was established in Australia to work in partnership to improve Australian education – perhaps dramatically – and address inequality in our schools. We believe that all children have the right to a quality education, and we are here to support great teaching, everywhere.

We have partnered with the Australian Education Research Organisation (AERO) and a number of leading schooling systems (including the National Catholic Education Commission, Catholic Education Canberra and Goulburn, Catholic Education Sandhurst and Melbourne Archdiocese Catholic Schools), to work with over 500 expert teachers to develop a bank of over 7,000 rigorous

and reliable lessons with more than 25,000 free fully-sequenced curriculum resources – including sequenced curriculum documents, and all related instructional resources including assessments – produced and quality-assured by teachers, for teachers.

Ochre has developed a significant bank of materials in the core curriculum subjects – all of which are aligned to the Australian Curriculum, the Victorian Curriculum and the NSW Syllabus. We are also currently in the process of mapping our materials with the Western Australian Curriculum and Assessment Outline. We have a roadmap which will see development of additional resources progressively over the next two years (see below, noting unless marked all resources labelled in progress will be made available to schools for first teaching in 2026).

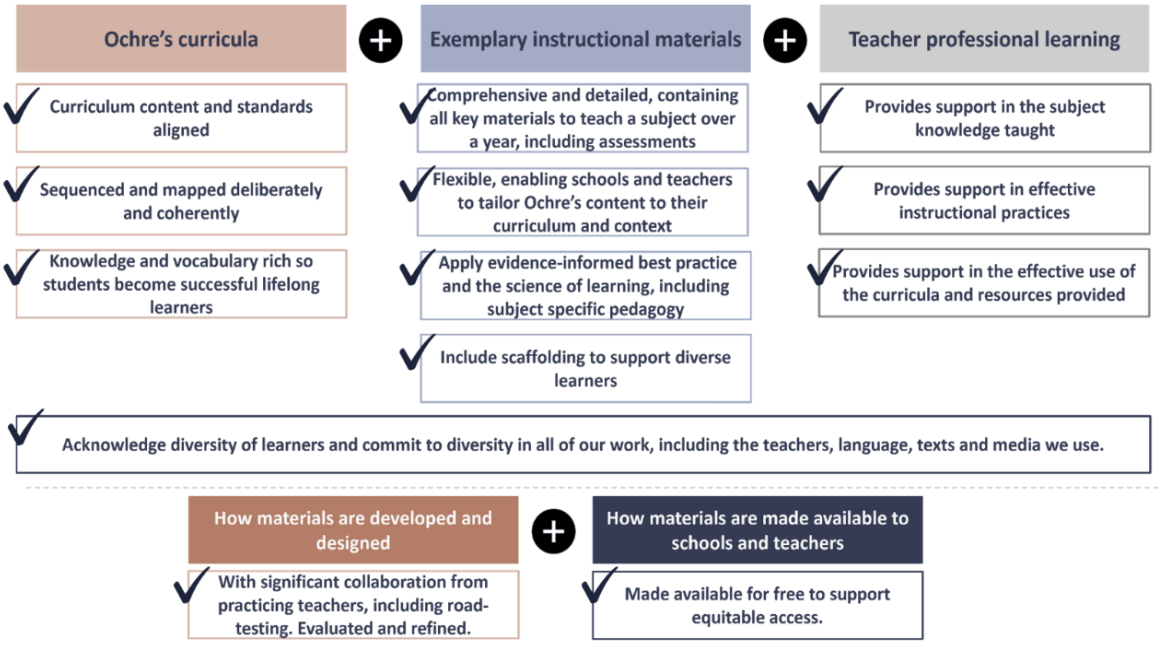
All resources freely available at www.ochre.org.au (upon registration)
Lesson numbers are AC lessons only

	Maths	English	Science	HASS (Humanities)
Years F-2	*432 lessons*	*432 lessons*	*108 lessons*	*96 lessons*
Years 3-6	*432 lessons*	*720 lessons*	*224 lessons*	*192 lessons*
Years 7-8	216 lessons	*216 lessons*	*216 lessons*	
Years 9-10	250 lessons	*Available from 2027* *216 lessons*	*Available from 2027* *216 lessons*	

Complete
In progress
Not planned / funded

Note, we are also developing intervention materials in Years F-2

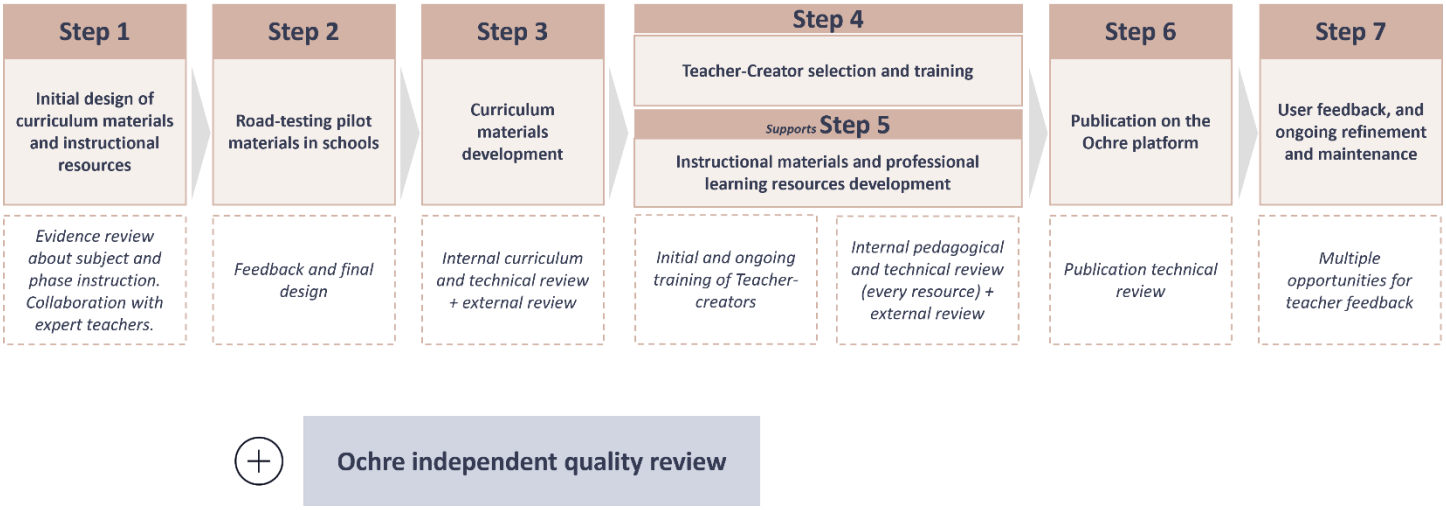
All materials are developed in line with our Quality Framework.



We also develop subject-specific disciplinary quality frameworks for each of the sets of materials we develop. These subject-specific frameworks acknowledge and address the pedagogical differences existing between different subject areas. These quality frameworks are documented in our Curriculum Principles for each subject and phase of learning.

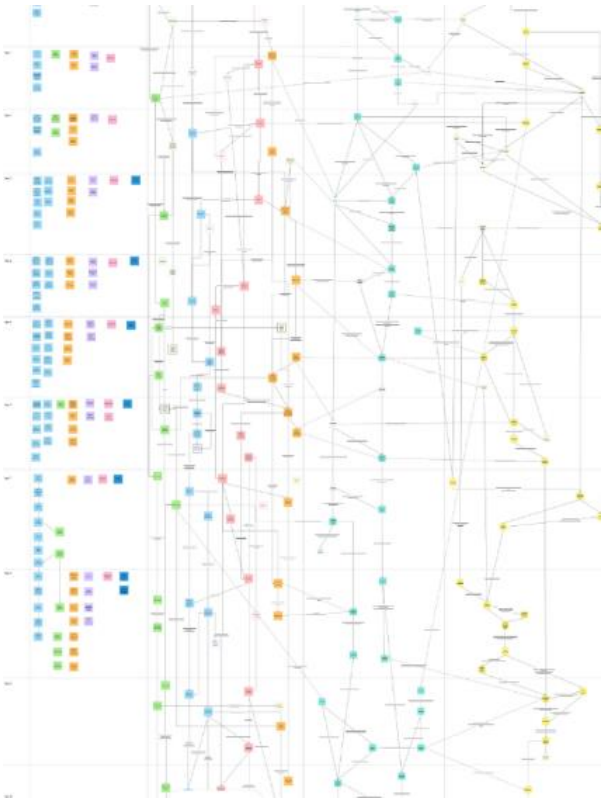
Our quality frameworks include significant explicit support within all Ochre Tier 1 materials for diagnosing misconceptions and scaffolding instruction to support diverse learners. We are also developing aligned instructional materials to support students that require additional support through a multi-tiered system of supports framework (MTSS).

Our materials are developed with high levels of quality assurance and control. All materials pass through our 7 Step Quality Assurance and Improvement Process (including our new independent quality review).



All Ochre materials are made available as Open Education Resources (OER), which includes utilising the least restrictive Creative Commons licence with our material (Creative Commons Attribution Licence (CC BY) (https://creativecommons.org/licenses/by/4.0/). This licence allows material to be shared and adapted for any purpose, as long as the copyright owner is attributed. This makes it clear to teachers how Ochre resources can be used and allows flexibility for these resources to be used in new or different ways in the future.

Our curriculum programs are comprehensive, sequenced and ambitious, placing powerful knowledge at the heart of the curriculum. We have developed a 'whole-school curriculum map' which sequences ambitious curriculum knowledge across subjects and year levels from Years F-10. This underpins the development of all of our materials.



Our materials include for all subjects:

Curriculum materials

- Curriculum principles: explain our curriculum intent.
- Yearly curriculum overviews: specify ambitious curriculum knowledge and skill.
- Unit overviews: outline the core knowledge and skills taught in the context of each unit.
- Scope and sequences: carefully sequences knowledge vertically and horizontally.
- Progression maps: detail the progression of knowledge and skills across the curriculum
- Teacher Handbooks: specify knowledge and skills, provide key questions, suggested tasks and key vocabulary.
- Assessment tasks: to monitor student progress, identify individual needs and demonstrate student understanding.

Lesson materials - supplement and support lessons

- Do-nows or Daily Reviews: opportunities to embed retrieval and spaced practice, and for formative assessment
- Reteach materials: short mini-lessons that support consolidation of key content or skills
- Knowledge organisers: provide finger-tip knowledge for students
- Teacher presentation slides: with key images, diagrams to be displayed
- Student workbook: to support key tasks and independent practice

Support materials

- Professional Development: key support materials for each subject including a teaching guide, subject and pedagogy knowledge for teachers, training videos and our growing bank of videos of teachers enacting our curriculum in Australian classrooms.

Resources are available for schools to access online to view, download, adjust to point-of-need responsive teaching, and print/upload to school repositories. It is important to note that in this way Ochre resources form part of the growing range of ed-tech lesson planning and curriculum materials (noting that in this way they also relate to the Commission's recommendations in relation to ed-tech).

All materials are fully adaptable, including through opportunities to embed and reflect local or contextually relevant material. The resources comprise advice and guidance to support schools in contextualising the resources, adapting them without compromising the evidence-based sequencing of the curriculum, and exemplifying effective lesson delivery.

Given the strong evidence that teachers are far more likely to engage with resources as intended if they engage with teacher guidance and professional learning, we have continued to strengthen the supports that we provide to teachers and school leaders alongside our materials. These support resources help to build teacher confidence and capability in adopting new approaches, and to adapt the materials for their contexts.

From July 2025, Ochre has joined forces with Teach Well, a social enterprise providing rich professional learning experiences enabling the implementation of high-impact practices in every classroom. As a registered social enterprise which is wholly owned by Ochre Education, revenue from Teach Well will support Ochre Education in its mission to provide free, high-quality curriculum resources to all Australian teachers, alongside support for educators to implement the Ochre curriculum across diverse classrooms and school communities.

Ochre has delivered excellent value for money in the development of its resource bank. Our materials have seen exceptionally strong voluntary engagement by schools that can benefit from them. Awareness of our resources has expanded largely organically through word-of-mouth, with very little dedicated investment in communications activities.

Over 135,000 teachers are accessing our resources across 90% of Australian schools. Users rate the quality of our resources highly (4.4/5). 4 in 5 teachers report student growth and achievement using Ochre resources. Teachers report that using Ochre resources saves them on average 3.3 hours a week. For more detail on our work and impact see our recent Impact Report which can be accessed at the link [redacted].

Over the four years in which we have been operating, we have seen significant increased demand from teachers for high-quality resources, led by the availability of our resources, and by increasing curriculum expertise amongst teachers and school leaders.

Teachers and schools choose Ochre to support them with their curriculum because:

- Our team provides expert specialist expertise around effective, high-quality curriculum and instruction;
- We work nationally and across sectors, drawing together expertise and providing support across States and territories and schooling sectors;
- We are sector-led, understanding the needs of schools and working closely with schools on the ground;
- We respond to experiences in the classroom, using teacher and school feedback to further strengthen the impact of the Ochre curriculum materials;
- We deliver the scale of resources and supports required rapidly and with agility, responding to school need and demand.

In summary, Ochre Education has over the last four years:

- Developed (or will have developed by mid-2027) at least 80% of the core curriculum (English, maths, science, humanities) across the Australian Curriculum and state variants with a highly effective model bringing together an exceptional focus on the evidence-base, quality assurance and sector-led contribution.
- Developed a national platform enabling all teachers across Australia to access quality Open Education resources.
- Worked with significant scale of schooling systems; with 90% of schools accessing our resources.
- Developed significant implementation support for schools to enact our curriculum and instructional resources, particularly around curriculum leadership, design and implementation (areas which currently are poorly serviced within Australian education).

2. Section 2: Comments on the Productivity Commission's Interim Report's draft recommendation 1.1 (a national platform for lesson planning materials)

Draft recommendation 1.1

Invest in a single national platform for all teachers to access lesson planning materials

- The Australian Government should invest in a single online national platform that houses a comprehensive bank of high-quality, curriculum-aligned lesson planning materials. These materials should be publicly available to teachers in all states and territories and across all school sectors, including Catholic and independent schools.
- To support this objective, appropriate national education bodies should be asked to:
    - develop and maintain a complete resource bank of lesson planning materials that aligns with and covers all components in F–10 of the current endorsed version of the Australian Curriculum. These materials should draw from existing materials where these are assessed as high quality and support evidence-based teaching practices that align with how students learn
    - establish a national framework for assessing the quality of lesson planning materials and their alignment with evidence-based education standards
    - promote a national online platform for all teachers to access the resource bank. Materials on the platform should be regularly updated and include jurisdictionally developed materials where feasible
    - develop professional learning programs to help teachers to use the materials and schools to adopt a whole-school curriculum approach.

Ochre commentary

We strongly support the following needs identified by the Productivity Commission's Interim Report, and the reform recommended to address these needs:

The Interim Report identifies the following needs:

- To address stagnating student outcomes and disadvantaged students being left behind
- To reduce workload pressure on teachers to better support teachers, and reduce attrition, especially in schools working with under-resourced communities, including in rural and remote locations.
- To address current inequities in access to high-quality tools and resources.

The Report recommends the following reform to address these needs:

- The Australian Government should invest in a single online national platform that houses a comprehensive bank of high-quality, curriculum-aligned lesson planning materials. These materials should be publicly available to teachers in all states and territories and across all school sectors, including Catholic and independent schools.
- Materials should be high quality and support evidence-based teaching practices that align with how students learn.

We do however also note that the Interim report misses an opportunity to identify other important benefits of this approach, which go beyond the efficiency and reduction of teacher workload and relate to teacher effectiveness in contributing to supporting lifting student outcomes.

Quality teaching is the most important in-school factor for student learning. The research shows quality teaching is unlocked when teachers use structured, knowledge-rich curriculum materials. Rigorous research – including multiple Randomised Controlled Trials (RCTs) – demonstrates that evidence-based, knowledge-rich materials can significantly enhance student learning. These materials work together with effective teaching, building knowledge incrementally to ensure all students, particularly those from disadvantaged backgrounds, can engage meaningfully with year level class curriculum. For example, most recently, a 2023 US longitudinal study of 2,000 students compared the reading scores of students who attended charter schools that use a set of Core Knowledge curriculum materials to students who had applied, but missed out. The study analysed over four years of data of students beginning in kindergarten, and found that students from low-income families could perform similarly as children from higher-income families when taught with high-quality curriculum materials. Additionally, one of the charter schools in a low-income school district had statistically significant, moderate to large effects that eliminated the equity achievement gaps in reading and mathematics.[1]

We have seen such benefits strongly realised in our work over the last four years. We have a unique insight into these benefits, as the only large-scale organisation that has supported curriculum and lesson planning in this way in Australia. We have spent the last four years building and executing the approach recommended in the Commission's Interim Report. Specifically such broader benefits of the creation and provision of curriculum materials and related professional learning supports include:

- Reducing workload pressure on teachers through inefficient lesson planning also frees up teacher and leader time to focus on responsive teaching and addressing student needs which have the potential to strongly impact student outcomes, particularly around equity.
- That curriculum materials act as exemplars of high-quality curriculum planning for schools (noting how few schools within Australia are adequately supported to have a coherent and sequenced school-level curriculum in place).
- That materials support schools to shift their practice away from current ineffective teaching practices towards proven best bets in teaching approaches.
- That materials can be seen as 'educative', supporting teachers to build their subject content and pedagogical knowledge, and building professional practice.
- That materials demonstrate what grade-level teaching and learning looks like, supporting teachers to enact high expectations for all students, which is especially important for disadvantaged students.

[1] Grissmer, David, Thomas White, Richard Buddin, Mark Berends, Daniel Willingham, Jamie DeCoster, Chelsea Duran, Chris Hulleman, William Murrah, and Tanya Evans. (2023). A Kindergarten Lottery Evaluation of Core Knowledge Charter Schools: Should Building General Knowledge Have a Central Role in Educational and Social Science Research and Policy?. (EdWorkingPaper: 23-755). Retrieved from Annenberg Institute at Brown University: https://doi.org/10.26300/nsbq-hb21

- That materials facilitate teachers and leaders engaging in professional dialogue and sharing best practices in their settings, especially around grade level expectations of learning.
- That materials enable all students to have access to the whole curriculum, including, for example, access to high-quality texts.
- That a bank built by expert practicing teachers can share effective practice between classrooms, schools and systems, democratising student access to best practices in a way that retains high levels of rigor and quality assurance.
- That in developing our bank of resources, we have helped to further develop a large group of teachers expert in curriculum development (500), which has spillover benefits for their schools and the schooling networks and systems in which they work.

Schools utilising Ochre resources are increasingly seeing early evidence of the positive impact on teaching practice and student learning. NAPLAN achievement data underscores the positive impact of the Catholic Education Canberra & Goulburn (CECG) Catalyst program, of which access to Ochre resources has been a significant element, paired with extensive professional learning. When comparing year-on-year data for 2023/24, the Australian Curriculum Assessment and Reporting Authority (ACARA) identified the Top 20 Schools Making a Difference. Notably, 13 out of the 20 top schools in the ACT were CECG schools. 75% of CECG students are assessed as proficient readers, significantly exceeding the national average of 66% in 2024.[2] Similar results have been seen in other schooling systems, and with many individual schools.

We do, however, believe that the Productivity Commission's recommendation as to how this proposed reform should be put in place is unlikely to deliver the benefits it seeks to produce, due to two key reasons:

a) Challenges in creating the national lesson bank drawing from existing materials.
b) Risks in a government agency developing the national lesson bank.

a) <u>Challenges in creating the national lesson bank drawing from existing materials.</u>

The Commission recommends that 'the national bank should **draw from existing materials where these are assessed as high quality** and support evidence-based teaching practices that align with how students learn.' We believe that this is fundamentally the wrong approach, which will repeat the mistakes of the past and poses significant risks.

The Commission accurately points out that 'teachers should have confidence in the lesson-planning materials they select for their classes' and recommends that 'materials on the national platform should be assessed against a clear framework to evaluate their alignment with the Australian curriculum, education standards and other evidence-based quality criteria'. This suggestion fails to take into account a number of important factors:

[2] See https://catalyst.cg.catholic.edu.au/ and Raising the grade: How schools in the Australian Capital Territory can lift literacy outcomes for students and the economy, Equity Economics (2023)

1. The need for curriculum materials to be sequenced and coherent over time

- The Commission's Interim report itself refers to the need for materials to be '*structured to follow a sequence*, and include learning activities that *gradually build* students' knowledge and skills' (our emphasis). However, bringing together different materials from different sources in the way the Commission recommends will not result in a coherent or carefully sequenced resource bank, even if these individual resources themselves are assessed as high-quality. It risks an atomised activity-driven approach to learning. An understanding of 'quality' in this context must take into account not only the quality of the evidence-base that underpins the teaching practices within lesson resources, but crucially a view of curriculum quality (disciplinary knowledge which is coherent, sequenced taking into account the conceptual hierarchy for each discipline, knowledge and vocabulary rich and ambitious). If the core of the activity of creating a national lesson bank is bringing together existing materials to better enable schools to 'pick and mix' resources, this risks replicating current practices which can ultimately undermine quality and increase workload. Lessons must be planned as part of a carefully sequenced curriculum design between years (and also sequencing between subjects where relevant), to have maximum impact on student learning. This is a critical design principle within Ochre resources, which have been carefully designed to balance curriculum coherence with the practicalities of school contexts and needs, including that schools will continue to make use of textbooks and other existing school-selected or developed resources. Within our units, unit plans and teacher guidance provide clear direction to teachers as to how lessons might be moved and adjusted in the unit sequence without compromising the evidence-base on effective curriculum sequencing. Similarly, our curriculum maps are accompanied by clear guidance to schools as to what dependencies exist within the curriculum sequence, so that schools can make evidence-based decisions on what adaptations to the sequence may be needed to best meet school needs.

- Teachers have found it difficult to navigate these disconnected store-front conceptualisations of curriculum in the past. The Scootle platform – managed by Education Services Australia (ESA) – has been in place for nearly 20 years. Whilst there is limited data on usage available, the platform has consistently seen limited use by teachers over this period (the latest ESA Annual Report shows that the platform had 3.7+ million page views in 2023-24; the Ochre Platform had, in comparison, 22+ million page views in the last 12 months). ESA's various resource hubs are similarly poorly utilised by teachers, given their limitations of scope in presenting a coherent curriculum and assisting teachers with the core areas of curriculum, instruction and assessment. Given this, it appears that a refreshed and updated Scootle platform – the National Online Learning Services (NOLS) portal which we understand ESA have been requested to develop by the Australian Education Senior Education Officials Committee – would be likely to represent a poor targeting of government resources, being unlikely to achieve the productivity benefits that the Commission seeks to deliver.

2. The limitations of current materials available

- It is also important to consider the scale and comprehensiveness in the materials the Productivity Commission has identified as being of worth to bring together into a national bank. In comparison to these sets of resources, we have developed a bank of over 7,000 Ochre lessons and over 25,000 instructional resources (across curricula). For example:
    - ESA's Maths Hub has just over 950 teaching resources (including adding an additional 80 last year), and the Literacy Hub has 280 teacher facing resources.
    - The Western Australian School Curriculum and Assessment Standards Authority (SCASA) has provided just under 400 teacher resources, many of which are not student facing classroom resources.
    - The South Australian Curriculum Prototype contains a limited number of sample units.
    - The NSW Department of Education developed curriculum materials contain primarily lesson plans contained within units of work, with few student facing lesson materials.
    - The Victorian Lesson Plan (VLP) initiative is the most broad in scope, but within this initiative materials provided are limited in scope compared to similar materials provided through Ochre (we provide almost double the number of lessons). For example, the core Ochre Victorian Curriculum aligned science curriculum will have 336 Foundation to Year 6 lessons compared to the VLP's 169 lessons, and 428 Ochre Years 7 to 10 lessons in comparison with 183 lessons in the VLP. Our decision regarding the number of lessons to be created is based on the time needed to ensure that students have access to the full curriculum, alongside a practical view of the amount of timetabled instructional time that schools may realistically have available.
    - Whilst The Queensland Government's Curriculum to the Classroom (C2C) materials are more comprehensive in scope, they have not been updated to align with the new version (Version 9.0) of the Australian Curriculum, and so require additional workload from curriculum leaders and teachers to check alignment before including C2C resources in teaching and learning.

- Although the Productivity Commission's Interim Report notes that any jurisdictionally developed materials brought together in this way should be assessed as high quality, it is worth noting that a number of sets of materials developed by jurisdictions to date have not consistently been aligned to evidence-based teaching practices. This is relevant to both materials developed in-house, or those procured by governments which have required significant effort to rectify prior to publishing.

- As noted in the Commission's Interim Report, consolidating existing resources requires a systematic assessment against a clear quality framework. This would be a complex and

resource-intensive process, necessitating ongoing evaluation as new materials are developed. Successful implementation would also depend on governments agreeing to subject their own resources to independent quality review, which some may be unwilling to do. Given the substantial gaps in current resources, this approach is likely to have a slower impact on teaching quality than the direct procurement and provision of high-quality, freely accessible materials.

3. The need for curriculum materials to be aligned to not only the Australian Curriculum, but also State and Territory variants

- The Commission's Interim report notes that national lesson bank should 'cover all components in F–10 of the current endorsed version of the Australian Curriculum'. For materials to be useful and relevant to schools and teachers within their contexts, all materials must be aligned with all key State/Territory curricula (NSW Syllabus, Victorian Curriculum, WA Curriculum), and not just the Australian Curriculum. This is especially important in relation to regulatory requirements around the implementation of curricula within jurisdictions. For greatest efficiency, materials should be aligned with these curricula from the outset of development. Taking this approach would not add significant cost, provided the broader scope is agreed from the beginning.

b) <u>The risks in a government agency developing the national lesson bank</u>

Instead of assuming that governments - whether through national bodies or state and territory jurisdictions - should undertake this activity entirely by themselves, the Productivity Commission should consider the appropriate role of different actors across the education ecosystem in supporting the development of a national lesson bank. The Interim Report appears to recommend that government both 'steer' and 'row' in relation to curriculum materials. We propose instead that government focus on steering, while entrusting the rowing to established expert providers.

Note that in the table below we refer to existing bodies in the national education architecture; the recent suggestion to potentially merge these national education bodies does not change the analysis provided as to the most appropriate roles for government or other entities to perform.

Role	**Current / new**	**Organisation**	**Rationale**
Agreeing and publishing a national curriculum framework and state-based versions	Current	ACARA and State Curriculum bodies	*Current role*
Setting quality standards for effective teaching and learning practices	Current	AERO	*Current role*
Funding development of detailed curriculum and materials over time - optional for schooling systems and schools to adopt. Includes funding independent evaluations of these resources.	New	Australian Government	A national role across jurisdictions and sectors, especially supporting smaller jurisdictions.
Delivery of a national bank of adaptable evidence-based curriculum resources and aligned instructional materials for systems / schools to adopt, in partnership with the sector and delivered via a national platform. Materials are open-licensed, quality-assured, and adapted over time. Sets a view of best practice in curriculum implementation. Supports school system leaders, school leaders and teachers with implementation supports for materials.	New independent body *(noting this is the role that Ochre is currently performing)*	Independent body with high-quality contributions from teachers and other organisations.	Requires an expert provider, with a single focus on the quality of materials. Ability to innovate, stay the course, be genuinely sector-led, with a close link to classroom practice.
Evaluate national bank - an external and independent evaluator to conduct both process and impact evaluations.	New	Independent evaluation	Requires independent assessment of impact.
Align view of school effectiveness and support for schools with best practice in curriculum implementation.	Current – could be further developed	Depts of Education and non-govt systems	Provide holistic support to schools across systems / networks.
Review all curriculum materials provided to schools (including those created by the national body) and provide a view on quality.	New *(note this could be put in place over time).*	Independent body (or an organisation such as AERO)	Some benefits to be fully independent of government.

As it stands Recommendation 1.1 suggests that 'appropriate national education bodies' take the lead in developing the national lesson bank. There are clear challenges to governments playing this role:

- Government delivery can risk consistent quality of materials. An independent body's sole focus can be on the quality of materials (in line with, say, AERO's evidence reviews), not juggling multiple competing and shifting government priorities.
- With generally slower procurement, review, and approval processes, governments can be challenged to innovate and respond quickly to user feedback. An independent body can be more agile - experimenting with new formats (e.g., opportunities presented through technology and AI) and iterating rapidly. This includes navigating existing complex copyright frameworks and commercial licensing agreements.
- Even if long-term funding is committed, governments can struggle to stay the course, meaning curriculum materials can quickly become outdated. Materials need to be updated to align with any changes in the national curriculum (or State variants), and to take into account emerging developments in the evidence-base and feedback from schools and teachers. If led by government, shifting political cycles or ministerial agendas can mean that commitments to a national bank could falter and resources could quickly become outdated, severely limiting their use and effectiveness over time.
- An independent body can be genuinely sector-led with a close link to classrooms and classroom practices, partnering with teachers, subject experts, and schools to create and trial materials.
- The body playing this role must be seen as sufficiently sector-led and independent to earn the required trust and professional ownership from teachers and schools to strengthen uptake. To maximise buy-in, governments should ensure that any processes or resources are co-designed with teachers and schools, rather than perceived as centrally imposed. A significant investment in professional learning support to support schools in using materials can seek to mitigate risks of inconsistency in implementation through such a sector-led approach.

3. Ochre's alternative recommendation to Invest in a single national independent platform for all teachers to access curriculum materials

Instead, Recommendation 1.1. should be amended to clarify that in establishing a national bank of curriculum materials the Australian Government's investment could be in a high-quality curriculum provider, like Ochre, which is independent or arm's length from government. In considering how this approach could be implemented, it would be important to consider appropriate funding and accountability structures for such a body. Such a body would:

- Secure high-quality contributions from a broad range of expert sector stakeholders, including teachers, schools, representatives from schooling systems and other external subject experts that have relevant expertise in evidence-based curriculum and instruction, including working in partnership with Aboriginal and Torres Strait Islander peoples and organisations to design and deliver materials, and aligning to critical frameworks such as the AIATSIS framework;
- Work with such sector experts to define curriculum quality (this approach could be aligned with Ochre's existing quality framework including subject-specific frameworks);
- As a priority, develop all curriculum and resources to support delivery of the core curriculum (English, maths, science, humanities) aligned with the Australian Curriculum and state variants. These curriculum materials need to comprise a carefully considered sequence of learning to best take advantage of schooling over multiple years, with advice and guidance provided to schools about how sequencing and timing can be adapted to school contexts. These curriculum and lesson resources must include materials to support delivery of the curriculum in multi-age classes given the prevalence of these within Australian schools. The body should ensure resources are evidence-based and in line with knowledge-rich principles. It should ensure appropriate choice and adaptability within the resources. Over time, it should supplement these resources with other areas of the curriculum (The Arts, Languages, Health and Physical Education (HPE), and Technologies);
- Make resources available under an Open Education licence free to access, via a single national platform, accommodating security, privacy and technical standards;
- Maintain resources over time, responding to changes in the curriculum, developments in the evidence-base and user feedback;
- Build processes for testing, evaluating and continuously improving resources, growing the evidence and understanding of curriculum quality within Australia. Work with an independent evaluator to put in place a robust longitudinal evaluation to understand the impact of this approach over time.

- Alongside, the body could be commissioned to develop additional resources to support schools to implement a Multi-Tiered System of Supports (MTSS) model for students that need additional support (Tier 2/3) in English and maths from years F-10 initially. These Tier 2/3 resources should be aligned with the Tier 1 curriculum to ensure that methods and

concepts taught in these intervention classes are coherent with regular Tier 1 classroom instruction.

- In addition, the Government should consider such a body supporting with:
    - Building an AI tool to support teachers to more easily adapt resources to their localised context. This would be a similar model to the Oak Aila tool (which has been developed with open-source code which could be leveraged in the Australian context). This would have significant advantages to other AI-led approaches by:
        - Drawing on trusted and credible content, which is already carefully sequenced and quality assured. This avoids an atomised activity-driven AI lesson planning approach.
        - Embedding a strong evidence-based instructional model.
        - Ensuring appropriate licensing of copyright materials to support ethical use.

    - Supporting the development of lesson videos to accompany the instructional resources. These would support a national contingency for remote education should it be needed in the event of disruption, as well as act as a professional learning resource for teachers and to support pre-service teachers and new graduates.

Costs for such a body would need to include consideration of the following costs: development of curriculum materials; supporting schools to effectively utilise materials; platform, engineering and hosting; analytics, research, and evaluation; operations.

Providing funding for such an approach would be substantially less expensive than the existing duplication underway. For example, the following funding commitments are significantly more than Ochre's current expenditure, without clear dividends on quality or guarantee of maintenance into the future:

- The Australian Government allocated $34.6 million over four years to continue supporting and delivering a suite of Teacher Resource Hubs in the 2023–24 Budget. These include eight teacher hubs, which – whilst including some high-quality materials and tools - have limited utility and usage amongst teachers given their scope.
- In the 2023–24 Victorian State Budget, the government allocated $40 million specifically to develop lesson planning and curriculum materials aligned with the new Victorian Curriculum F–10.

Alongside, the government could consider when an independent quality-assurer for curriculum materials should be put in place. Noting - as above - that any such process would be a complex and resource intensive process, and - given the substantial gaps in current resources - this approach is likely to have a slower impact on teaching quality than the direct procurement and provision of high-quality, freely accessible materials.

To most effectively support delivery of the national lesson bank, the Australian Government should also consider investing in the following:

- Providing funding to develop an online assessment platform and associated curriculum-aligned assessments to be used by schools across the country, including an online platform designed to help both teachers and students embed knowledge more effectively through Formative Assessment retrieval-based quiz practice. Note that ACARA is currently working on a Formative Assessment Framework which could contribute to this approach.
- Developing a set of national professional development programs for school leaders and teachers with a focus on improving evidence-based teaching and leadership in schools, potentially aligned to support different stages of a teacher's career. These could be similar to the National Professional Qualifications (NPQs) in England. There is a particular need to develop such supports to assist teachers in the teaching of mathematics, as outlined in the Grattan Institute's recent report on maths[3]. These programs would be aligned with recent reforms within Australia to Initial Teacher Education.

Note that, in relation to the national curriculum, various commentators have suggested that - in line with best practice internationally - the Australian Curriculum (and State variants) should be completely overhauled to provide a more specific, detailed and ambitious approach to detailing what should be taught in Australian schools. We would agree that both the Australian Curriculum and state variants could be significantly strengthened in this regard (noting the NSW Syllabus is certainly closer to this ideal; with identified gaps remaining). We also note that our materials are a mediating layer between the formal curriculum and its classroom implementation.

We would be keen to contribute to improvements through curricula review, noting our significant expertise in this area and that one of the significant challenges in improving the Australian Curriculum is having experts who provide an evidence-based contribution to this process. However, we are also realistic about the length of time and effort it will take to make these improvements, particularly given the national governance that determines curriculum changes. We do not agree that work on developing a national bank should wait until the curriculum has been improved, but that these processes can work in tandem, and indeed the development of a genuine high-quality national bank would assist in the process of further development of the curriculum.

[3] The Maths Guarantee: How to boost students' learning in primary school, Jordana Hunter, Amy Haywood, Nick Parkinson, and Daniel Petrie (2025)

4. Brief comments on Draft recommendation 1.2 (educational technology and artificial intelligence in schools)

Draft recommendation 1.2
Lead national efforts to ensure equitable access to educational technology (edtech) and artificial intelligence (AI) The Australian Government should provide national leadership on edtech and AI in schools, and work to make the best available tools available to all teachers. Appropriate national education bodies should:

- establish a framework for assessing edtech tools' quality and alignment with evidence-based practices
- undertake a stocktake of what tools are being used, within Australia and internationally
- assess selected edtech and AI tools, and recommend suitable tools for nationwide use
- coordinate acquisition of AI tools for national use, drawing on the combined purchasing power of all states and territories
- continue to develop and refine guidelines for teachers and school leaders to guide the adoption and use of edtech tools
- continue to fund trials of new edtech with a commitment to national roll-out of successes. State and territory governments should focus their efforts on professional development and wrap-around support for schools that enables teachers to adopt and use these tools effectively

The use of generative Artificial Intelligence in schools is rapidly increasing; whilst this technology offers significant potential to amplify teacher expertise, there are important reasons why we should approach this usage with caution. We provide some brief comments on the Commission's Interim recommendation 1.2:

- There is a significant distinction which should be made between use of AI in schools for administration and compliance which can reduce the administrative burden on teachers, and use of AI in pursuit of educational outcomes (in relation to curriculum, instruction and assessment).
- In relation to the latter, there is emerging research evidence of the risk of unbounded use of AI to negative cognitive offloading or cognitive dependence, the use of technology to spare mental effort which impacts on critical thinking abilities[4]. One key concern is that the technologies which are being incorporated into schools should be proven to support students' learning by increasing and multiplying their cognitive efforts, rather than merely to complete the work on their behalf. They must also consider the risk of negatively impacting teacher knowledge and expertise, with any deficit being passed down to students.
- Any framework to assess edtech tools – including AI – must include at its centre consideration of educational equity and excellence, how products help to improve educational outcomes for teachers and schools. It should carefully consider and assess the key risk of diminishing users' engagement with 'effortful thinking, rich understanding' and ensuring that use of technology 'addresses misconceptions, and integrates transparently with teacher expertise'[5].

[4] See Daisy Cristodoulou, Are We Living in a Stupidogenic Society, 2025
[5] See Karl Hendrick, AI in Schools: Three Things to Get Right Making AI Work for Learning, Not Just for Efficiency, (2025)

- The concept of 'boundaried AI' or designing for containment is useful to consider in the context of teaching and learning – including conditions that set limits on an AI's output and function, ensuring it stays within specific parameters for accuracy and safety.
- The developing framework for assessing edtech tools' quality and alignment with evidence-based practices (the work tasked to ESA and AERO) should include these considerations. This work to develop national edtech standards and a quality assurance mechanism is essential and should be expedited, aligned with the Australian Framework for Generative Artificial Intelligence in Schools.
- Such standards should be used to guide procurement processes to develop and scale evidence and equity-focused design. Recent work in the UK by the Chartered College of Teaching through its EdTech Evidence Board (EEB), a project to help schools select effective digital tools by reviewing product evidence, looks particularly promising and could be considered within the Australian context.
- In considering the development of any additional tools for use (the Commission's recommendation to fund trials of new edtech), the first consideration must be educational needs. One promising approach is the development of Oak National Academy's own genAI tool Aila[6]. This has a 'boundaried design' being developed based on curriculum resources developed by Oak, and with a defined evidence-based pedagogical model. Aila uses AI to support teachers to make adaptations of Oak lessons (for example, reducing the literacy level of keywords, adding additional support such as sentence starters and success criteria to tasks where students might need it, or swapping in tasks teachers have previously used). This approach could be replicated within Australia, with Oak's code being freely shared and available through its open-source approach to development.

[6] See: https://labs.thenational.academy/aila