

14 September 2025

Submission to the Productivity Commission

Response to the Interim Report: *Building a skilled and adaptable workforce*

1. Introduction

The Australian Secondary Principals' Association (ASPA) is the national professional body representing the interests of government secondary school leaders across Australia. ASPA's members are collectively responsible for the learning and well-being of over 1.1 million children and young people and we are deeply committed to ensuring all Australian children and young people have access to a high-quality education. ASPA welcomes the opportunity to provide a submission in response to the Productivity Commission's interim report, *Building a skilled and adaptable workforce*.

ASPA acknowledges the Commission's work in identifying the critical importance of foundational skills for a productive and adaptable workforce. We share the report's concern for easing the pressure on teachers and improving student outcomes. However, ASPA is surprised by the report's primary recommendations in this area. The proposals for a national bank of lesson plans and a national approach to education technologies (edtech), while well-intentioned, fail to address the well-documented, systemic issues that drive unsustainable workloads and threaten the quality of teaching and learning in Australian schools.

This submission will focus on the recommendations related to foundational skills, arguing that the proposed solutions are a misdiagnosis of the problem and that investment must be redirected to address the underlying conditions the teaching profession has consistently identified as critical.

2. Recommendation for a National Lesson Plan Bank

The interim report recommends establishing a "national platform housing a comprehensive bank of high-quality lesson planning materials" to alleviate pressure on teachers. ASPA contends that this recommendation is not a solution the profession has asked for and fails to address the root causes of workload pressures.

This position is shared by our colleagues at the Australian Education Union (AEU), who note that off-the-shelf lesson plans were the "last thing teachers said would help them to lift results". Instead, the AEU highlights that the profession's priorities are "additional classroom support, more teachers and intensive tutoring support".

The assumption that providing standardised lesson plans will significantly reduce workload is questionable. As highlighted by Dr Nikki Bruner (2025), this is directly supported by a recent UK report for the National Education Union which found no evidence of workload reduction from centralised resources, precisely because of the professional necessity for teachers to adapt and modify materials for their students' specific needs (Francis, Taylor, & Tereshchenko, 2024). Curriculum differentiation to meet the diverse learning needs of students in any given classroom is a core professional skill and responsibility. Providing a standardised resource does not remove the complex and time-consuming work of adapting materials for individual learners; it simply changes the

starting point. As Brunker (2025) notes from her work with pre-service teachers, modifying externally developed plans to be responsive to student needs often takes longer than creating bespoke plans.

The real drivers of teacher and principal workload are well-documented and severe. The Australian Teacher Workforce Data (ATWD) initiative reveals that a significant percentage of full-time teachers work 60 hours or more per week during term time. The report concluded, "The time spent on duties other than face-to-face teaching likely needs to be reduced in order to decrease overall working hours". These duties are predominantly administrative. Similarly, the Australian Catholic University's annual Principal Health and Wellbeing Survey, identifies the "sheer quantity of work" and "lack of time to focus on teaching and learning" as the top two sources of stress for school leaders, a consistent finding for over a decade. These pressures are compounded by escalating rates of threats and physical violence, crippling staff shortages, and the increasing complexity of student mental health needs.

Outsourcing curriculum development through a lesson bank risks de-professionalising teachers and undermines their autonomy and professional judgement. ASPA's 2025 Policy Briefing, developed through extensive consultation with principals, puts forward practical, evidence-based recommendations for transformative reform. These strategies are designed to create the conditions for success by ensuring "healthy and effective school leadership" and addressing "critical challenges" through specific actions on equitable school funding, principal wellbeing, teacher shortages, and inclusive education. A national lesson bank is a superficial measure that fails to engage with any of these foundational, systemic priorities that the profession has identified as urgent.

ASPA asserts that investment would be far more effective if directed towards addressing these known systemic pressures. Reducing the administrative and compliance burden, ensuring schools are fully funded to employ adequate specialist and support staff, and implementing genuine strategies to address teacher shortages would empower teachers to dedicate their time to their core function: designing and delivering high-quality, differentiated teaching and learning for their students.

3. Recommendation for a National Approach to AI and Edtech

ASPA acknowledges the potential of Artificial Intelligence (AI) and other education technologies to support teaching and learning. However, we urge caution and echo the position of the Independent Education Union of Australia (IEU) that "transparency and collaboration must guide AI in education".

From the perspective of school leadership, ASPA is concerned that rapid implementation of untested or poorly managed AI programs will inevitably increase, rather than reduce, the already unsustainable workloads of our staff. Therefore, it is imperative that any national approach is developed in genuine and ongoing consultation with the profession. For successful implementation at the school level, staff must be provided with adequate release time, access to specialist support, and sustained, high-quality professional development to manage these new tools effectively and safely.

ASPA maintains that for any AI tool to be of value, it must adhere to core pedagogical principles. It must be proven to be accurate, be adaptable to the specific context and needs of the classroom and must not undermine the essential professional autonomy and judgement of teachers. The role of technology in our schools should be to augment and enhance the professional expertise of our teachers, never to replace it. To safeguard both students and staff, any national framework must be

underpinned by strong regulatory oversight to manage the significant risks associated with data privacy, algorithmic bias, and the potential for misuse.

4. ASPA's Recommendations for a More Productive Approach

Rather than pursuing top-down, standardised solutions that have not been requested by the profession, ASPA urges the Productivity Commission to align its final recommendations with the evidence-based priorities identified by school leaders and teachers.

Drawing from ASPA's 2025 Policy Briefing, we recommend the Commission focuses on practical, evidence-based recommendations that will create the conditions for a skilled and adaptable workforce by strengthening the education system itself. We propose the following:

1. **Address Teacher and Principal Workload at the Source:** Recommend a national plan, developed with the profession, to significantly reduce the administrative and compliance burden on schools. This would free up principals and teachers to focus on their core responsibilities of leading, teaching, and learning.
2. **Invest in a Supported Workforce:** Recommend that all governments deliver full funding for public schools *now*. This investment is essential to provide the additional classroom support, specialist staff (such as counsellors and psychologists), and smaller class sizes needed to meet the increasingly complex needs of students. This directly addresses teacher shortages and workload.
3. **Prioritise Professional Autonomy and Capacity:** Instead of standardised lesson plans, recommend investment in high-quality, collaborative professional learning that builds the capacity of teachers to design and implement evidence-based, context-specific curriculum and pedagogy.

5. Conclusion

The Australian Secondary Principals' Association believes that building a skilled and adaptable workforce begins with a strong, equitable, and well-resourced public education system. The challenges of excessive workload, teacher shortages, and a lack of resources are the primary barriers to improving student outcomes.

The interim report's recommendations for a national lesson bank represent a misstep that ignores the evidence and the unified voice of the profession. It offers a superficial solution to a deep, systemic problem.

ASPA urges the Commission to reconsider its draft recommendations and instead focus on the foundational supports that will genuinely enable principals and teachers to do their best work. We must invest in our education professionals and trust their expertise, rather than seeking to standardise it. ASPA and its members stand ready to collaborate on developing meaningful reforms that will create a stronger, fairer education system for every Australian student.

References

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