

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

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The Productivity Commission's (PC) interim report *Building a skilled and adaptable workforce* contributes to a much-needed national discussion on the quality of Australian education. The following is a response to the invitation of the PC to make submissions on the interim report.

The report makes the important link between education and economic productivity in Australian society. It identifies the significance of students' education to meet changes in society, technology and workplaces. It identifies practical issues related to teaching and teachers' administrative responsibilities. It makes reference to the need to improve educational outcomes in literacy and equity. All of these issues need to be addressed. This response to the PC report references the practical proposal to introduce a national bank of lesson plans for teachers' access. It places the proposal in the wider context of regulation in Australian education nationally.

The report appears at a time of reported decline in literacy standards. The 2018 Commonwealth of Australia Review to Achieve Excellence in Australian Schools reported that "since 2000...academic performance has declined when compared to other Organisation for Economic and Development (OECD) countries, suggesting that Australian students are not improving at the same rate and are falling short of achieving the full learning potential of which they are capable." (Gonski 2). According to the most recent NAPLAN report (2025), students' literacy achievements are not improving. The decline in literacy and numeracy achievement of Australian children has been systematically documented in NAPLAN results and in the international PISA assessments over the past quarter century as well as in reports such as the Gonski study.

PISA results on the most recent report (2022 – results of the latest round of testing are awaited) contrast with students' performance on the same international test in 2003, when Australian students ranked second behind Finland in reading literacy. At that time Australia's students' scores were significantly ahead of 33 other OECD (Organisation for Economic Co-operation and Development) countries. Tests such as PISA and NAPLAN are limited measures of the complexity of literacy and numeracy. They are only snapshots. However the consolidated findings of both tests are reliable in reporting decline in literacy and numeracy, and confirm two decades of the falling performance on literacy and numeracy tests of Australian school children. Between 2003 and 2022 Australian students' mean performance was 487 points, a 37-point decline from 524 points in 2003.

Proposed remedies are many and diverse including increased funding, direct instruction, prescriptive curriculum and in the PC report the provision of a national bank of lesson plans.

Increased funding is not a solution to a much deeper crisis. The question is what are possible explanations for the continuing unsatisfactory students' performances on literacy and numeracy tests in international comparison? What has changed in this time?

The most significant change in Australian education over the last quarter century is the shift of educational policy, management of curriculum, and directions on teacher education from the responsibility of states and territories to a federal system of nationalisation. At a national level, the trend has been toward the regulation and standardisation of curriculum, with the national curriculum, ACARA, national testing and reporting of children with NAPLAN, and with the specification of national teacher standards. Each of these have contributed to the current centralisation of education in curriculum, in assessment and in pedagogy. They impact on how teachers manage children's social and intellectual development in their classrooms. The proposal of the PC to prepare a national bank of lesson plans adds to the regulation and normalisation of teaching nationally.

Prior to the establishment of ACARA and NAPLAN, each state and territory education department competed to enhance quality education, which they reported in professional conferences, curriculum projects, and in teacher education programs. Educational sectors worked together with universities and colleges of education conducting applied research, reporting results and applying studies as appropriate. Jurisdictions had strong curriculum directorates staffed with qualified and experienced professionals, supporting teachers with up-to-date information about research findings, developing local relevant resources, supporting teachers' classroom research and organising inservice training.

The policies and practices drew on national and international best practices in curriculum and pedagogy and applied them to local social conditions, needs and experiences. Although states and territories currently maintain independence in the applications of ACARA and responses to NAPLAN, there has been a reduction in local educational expertise, school-based skills and applied research. The national procedures for development and maintenance of ACARA are administratively complex, requiring consensus across systems. The procedures for review are cumbersome with loss of flexibility in making change, in adapting content and in evaluating impact. Processes for curriculum renewal are unwieldy, limiting responses to economic, social, political and regional changes and needs (see the three-state review of 2019). For this reason a discussion around the increasing regulation of education is needed to examine the impact on children's achievements and capabilities and on the professional work of teachers. This is a necessary discussion given that businesses in Australia advocate for deregulation in responding to changing societal conditions, diversity of contexts and the need to be responsive to new and emerging conditions globally. Regulation diminishes the capacity of education departments to develop "young people's ability to apply their knowledge and skills to real-world problems and situations." It affects "[a] students' capacity to understand, use, evaluate, reflect on and engage with texts in order to achieve one's goals, develop one's knowledge and potential, and participate in society. (OECD, 2023, p.14).

The Productivity Commission is explicit in recommending that *Australia should introduce a single online platform for all teachers to access high-quality lesson plans*. It assumes evidence that this would address issues of quality, equity and reduce the decline in children's literacy and numeracy performances on tests. The content of lesson plans would be vulnerable to ideological and political influence. Australian research on the educational efficacy of prepackaged lesson banks and more importantly teachers' use of such resources is needed as a priority. Based on comparative studies of use of school textbooks (Kuci 2020), which predetermine context, tasks and assessments, such a bank of resources would constrain teachers' responses to local students' needs, reduce teacher initiative and scope to extend students' learning.

A focus of Ministers of Education nationally is to use evidence for adoption of educational policies and practices. Research is needed to provide a factual basis for the PC recommendation with data on teachers' decision-making and actual use of lesson plans (Breen and Littlejohn 2000). This would complement and up-date the Grattan report (2022) *Ending the lesson lottery*. Strengthening the quality of Australian teaching of literacy and numeracy requires studies on how teachers use the national curriculum for preparation of programs and delivery of lessons. The studies need to document teachers in action to contribute to our understanding of what is the actual realisation of curriculum in local programs and lessons. The results of such classroom studies are basic information for determination of policy and practices for "Building a skilled and adaptable workforce" and for application in teacher education and inservice.

The PC assumption that the provision of a bank of lessons would support teachers' work is contentious. Granziera et al (2025) surveyed 4, 959 teachers in primary and secondary schools to consider teachers' mental health and turnover intentions. It identified teachers' non-core workload as potential contributor to their mental health. Teachers are required to record details of students' performance based on complex ACARA curriculum specifications. The regulation of teachers' professional decision-making with lesson plans, national curriculum and national tests constrains teachers' joy and satisfaction in creation of programs of work and lessons designed for the children and students in their classes.

South Australian teachers experienced the impact of deregulation of education when in 1970 the Director of Education issued a declaration to all schools entitled *Freedom and Authority*, in which responsibility for curriculum delivery and monitoring was passed to school principals (Mickan 2020). It shifted curriculum from being centrally managed and assessed to creation and adaptation related to local community of children and citizens. Through collaboration with university and college researchers, curriculum designs and practices were based on the best current research and classroom documentation. The directive *Freedom and Authority* was supported with expert teacher curriculum writing, resource development and teacher inservice projects on designing programs and lessons. The combination of teacher expertise, teacher education and research, curriculum writing and professional learning programs impacted on literacy teaching, materials development and teachers' satisfaction and professionalism.

The Productivity Commission Interim Report on *Building a skilled and adaptable workforce* (August 2025) together with the national test NAPLAN and curriculum ACARA contribute to the regulation of school education, limiting teachers' adaptability, agility and skills to address the decline in language, mathematics and scientific literacies, documented in international and national tests. The trend to nationalisation of education and the implicit conformity to curriculum and measurement is exacerbated in the proposal for the "creation of a single, national platform to host lesson planning, curriculum and support materials, ensuring that all teachers can meet their students' learning needs". The proposal constrains teachers' creation of curriculum, materials and methods to address both national and local need for knowledgeable and skilled students'/citizens.

The national curriculum ACARA has narrowed the educational scope of school education through a cumbersome process of development and corresponding limitations on responses to local and international social, political and economic change. NAPLAN as a high stakes test reduces measurement of literacy and the reliability of test items in the process. The documented decline in school children's literacies in comparison with 30 OECD countries coincides with the nationalisation of Australian education, with the introduction of NAPLAN test and ACARA curriculum. Neither NAPLAN nor the national curriculum have achieved their goals for improving quality education or even reducing the decline in the three literacies. The Productivity Commission proposal would extend curriculum conformity to lessons, impacting teachers' agency and professionalism, restricting their satisfaction in the creation of programs relevant and challenging for local children, and in the process narrowing children's study experiences. Discussion around the PC proposal is needed together with classroom research to document teachers at work.

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