



Productivity Commission Review of the National School Reform Agreement

Queensland Government response to the Interim Report

INTRODUCTION

The Queensland Government welcomes the interim report of the Productivity Commission (Commission) Review of the National School Reform Agreement (NSRA), and its preliminary assessment of the effectiveness of the national policy initiatives (NPIs) and the appropriateness of the National Measurement Framework for Schooling in Australia (MFSA) in measuring the outcomes of the NSRA. The Queensland Government has engaged with the Commission throughout the review process to date, including by making a public submission to the study, and will continue to do so as the review progresses.

This submission responds to the interim report by: reiterating the value of a principles-based approach to selection and design of future national efforts; emphasising the distinction between NPIs and other forms of national collaboration; and seeking for the Commission's final report to provide clarification on its proposals for the structure of a future national agreement and its performance reporting framework, as well as practical learnings from the current NPIs. This response is to be considered in conjunction with the Queensland Government's initial submission to the review, available on the Commission's website.

FUTURE NATIONAL POLICY PRIORITIES AND INITIATIVES

Principles for national collaboration

The Queensland Government remains committed to a principles-based approach to any new policy priorities and/or NPIs under a future agreement, with future national collaboration to be assessed against clear principles, such as those



outlined in the Queensland Government's initial submission to this review and reiterated below.

Queensland is motivated to collaborate on national activities that:

1. Contribute to a coherent national vision for school education that takes advantage of future opportunities and responds to key challenges;
2. Require national effort to stay the course and make a real and sustained difference across the system;
3. Are based on strong evidence from an Australian context where possible;
4. Respect existing state and territory school activities where an improvement trajectory can be demonstrated;
5. Provide for flexibility and autonomy in implementation, acknowledging the different demographic and geographic circumstances between and within jurisdictions;
6. Avoid encroaching on constitutional roles of states and territories as system managers, providers and majority funders of government schools; and
7. Minimise assessment and reporting burden on students, teachers and schools.

These principles were carefully developed in the context of successful intergovernmental collaborations and provide a robust framework for determining future national efforts. The Commission's suggestion that the next national agreement should be focused on a small number of reforms is welcome, but the opportunity presented by any future NPIs to align with a clear, coherent national vision for education may be lost if a principled and strategic approach is not taken to the selection of national policy and reform initiatives.

Many of the initial submissions made by other state and territory governments also provided principles to guide future national collaboration. It will be important for the Commission to consider these in the context of any proposals made in the final report, noting the Commission's terms of reference direct it to give appropriate weight to the feedback of state and territory governments. These views are highly relevant as states and territories are subject to conditions, costs and risks related to their constitutional responsibility for schooling, roles as managers of the largest school systems, and position as parties to the NSRA.



The Commission's interim and final reports, and associated stakeholder contributions, will be valuable inputs to the development and negotiation of a future agreement by states, territories and the Commonwealth – providing a key reference point from which to begin the next iteration of this important intergovernmental collaboration. Consideration of established intergovernmental best practice principles such as those above will ensure the final report is practical and fit-for-purpose for the intergovernmental context of a future national agreement.

Current initiatives aligned to identified priority policy areas

The attention the interim report brings to issues of equity, student wellbeing and support for teachers and school leaders is welcome, and consistent with existing national and state-level priorities.

Outside of the NSRA, national work is already underway within a number of the priority areas, for example:

- The Queensland Government is actively participating, with the other jurisdictions, in the development of a *National Teacher Workforce Action Plan*, which aims to tackle the critical workforce issues being experienced across the nation.
- States, territories and the Commonwealth continue to support the Australian Teacher Workforce Data (ATWD) initiative, providing funding and sharing data under robust privacy and governance arrangements, to build a longitudinal evidence base to inform support and planning for the teaching workforce.
- Ministers are continuing to work together to consider distribution of needs-based recurrent school funding, which is the subject of reviews by the National School Resourcing Board (NSRB), and jurisdictions' collaboration on implementation of recommendations from the NSRB's *Review of Needs-Based Funding Arrangements* is well-advanced.

The Queensland Government is also progressing a number of state-based reforms related to the priorities identified by the Commission. In addition to its Bilateral Agreement (BA) state-specific actions, the Queensland Government has introduced and delivered policies and programs tailored to the unique needs of its



students, schools and communities, and designed to lift student outcomes across the board, for example:

- Queensland state schools are guided by the *Student Learning and Wellbeing Framework*, which emphasises that a core component of a whole-school approach to supporting students' wellbeing and mental health is to create an environment where all students feel safe and supported.
- The *Student Wellbeing Package* commits \$106.7 million and will increase the wellbeing workforce by up to 464 full-time equivalents over three years, including through the employment of psychologists in schools. The package will ensure that all Queensland state school students will have access to a wellbeing professional at school by June 2024.
- The Queensland Government also offers school staff the opportunity to attend *SAFEMinds* training, delivered by headspace-trained professionals, to assist staff to identify students with early signs of mental health concerns and respond appropriately.
- The Queensland Government is providing \$80.6 million to support a two-year transition to a new resourcing model for students with disability. This will target resourcing to schools for around an extra 30,000 students. All disabilities will be recognised, and schools will receive more resources earlier for Prep students.
- The Queensland Government is embarking on a strategic partnership with the Australian Institute for Teaching and School Leadership (AITSL) to develop and trial a Professional Standard for middle leaders in Queensland, to provide more guidance for these officers to reflect on their current ways of working, and to progress in leadership (including Principal) roles.
- The Queensland Government offers two internship programs – *Turn to Teaching* and *Trade to Teach* – to provide supported pathways into teaching for mid-career professionals and people with a trade qualification, to help address teacher shortages in critical teaching areas and priority locations. The programs' 'earn and learn' model provide interns with financial support, and income and mentoring while they gain professional

experience teaching a half-load in Queensland state schools from the second year of their teaching degree.

- The Queensland Government has recently announced the commencement of targeted consultation on its new *Equity and Excellence Strategy: realising the potential of every student*, an exciting vision for the future of education in Queensland, which is expected to be finalised ahead of Term 1, 2023. For more information, visit: <https://statements.qld.gov.au/statements/96299>.

Activity set out in the NSRA and Queensland's BA is an important part of the work the Queensland Government undertakes across the education system, but represents a minority of our total effort and investment in schools. The operational capacities of schools and systems are finite and need to balance core service delivery, system priorities and other national efforts. Additionally, states and territories' duty of care for children is paramount; the Queensland Government will always prioritise child safety and core education delivery in national collaboration efforts, including for data sharing initiatives.

It is therefore critical that all parties recognise and agree on the value and importance of any NPIs under a future agreement. Application of principles, such as those provided earlier, could help to guide this deliberation.

STRUCTURE OF A FUTURE NATIONAL AGREEMENT

The Commission's interim report appears to contemplate changes to the current structure of the NSRA, including the interaction between the NPIs and the state-specific actions in bilateral agreements, and proposed the creation of 'implementation plans' under bilateral agreements. The Queensland Government welcomes the initial exploration by the Commission of options for the design and structure of a future agreement, and looks forward to the outcomes of this consideration in the final report.

It will be important for the Commission to provide clarity on any final recommendations regarding the use of implementation plans, as distinct from bilateral agreements, under a future national agreement. An outline of the



Commission's rationale for the proposed framework or approach could provide useful guidance on the agreement structure contemplated by the Commission, including how to determine the types of activities or priority reforms best suited to each intergovernmental instrument.

Noting successful national reforms have been, and continue to be, pursued outside of the NSRA, it is important to consider that categorisation of an activity as an NPI carries with it significant financial and operational consequences. For NPIs under the current NSRA, implementation is a condition that must be satisfied for state-territory governments to receive recurrent funding from the Commonwealth towards the ongoing operation of government and non-government schools, as per the *Australian Education Act 2013* (Cth). Sanctions may be imposed on jurisdictions for failure to meet this (and multiple other) conditions, creating a risk that recurrent Commonwealth funding to government schools is reduced. Additionally, the design and treatment of NPIs as a static subset of national cooperative actions in education has inhibited the currency and adaptability of NPIs, as other priorities have evolved within the broader national agenda.

Collaboration and sharing of innovation between jurisdictions is also a key feature of intergovernmental relations. For many complex policy challenges, local and context-specific solutions can be better suited than centrally-coordinated responses. Cross-jurisdictional collaboration is an important source of innovation through sharing, adopting and adapting where successful local solutions exist. Rather than seeking to develop and build centralised national solutions from scratch, such approaches can help to reduce the risks of duplication or contradiction of jurisdictional efforts.

ACCOUNTABILITY AND MEASURES

The Queensland Government recognises the importance of strong accountability mechanisms and notes the Commission's initial proposals regarding changes to measures and reporting under a future national agreement.

The Queensland Government is directly accountable to the people of Queensland through the Queensland Parliament for delivery of education through government schools. Like other states and territories, Queensland is subject to numerous



accountability mechanisms, in addition to those specified under the NSRA and Queensland's BA, including:

- school annual reports;
- the *National Report on Schooling in Australia*, which aligns to the commitments in the *Alice Springs (Mparntwe) Education Declaration* and reports against nationally-agreed key performance measures;
- the *Report on Government Services*, which reports recurrent expenditure of government and non-government schools by the Commonwealth and state/territory governments; and
- *My School* reporting, including a breakdown of capital expenditure and recurrent funding for each school from the Commonwealth and state-territory governments for each calendar year.

NSRA performance reporting framework and the MFSA

Further explanation of the Commission's proposals regarding the NSRA's performance reporting arrangements would assist in clarifying the intended difference in purpose, scope and substance between (a) the current reporting and the changes contemplated by the Commission; and (b) the MFSA and the NSRA performance reporting frameworks.

The design of any performance reporting framework for the future national agreement will need to carefully consider and articulate:

- **The different aims and purposes of a national agreement performance reporting framework, as distinct from the MFSA.** The MFSA has a strategic and long-term focus on providing nationally comparable performance data to monitor progress towards the goals set out in the Mparntwe Declaration, and to deliver a system-wide health check and insights into changes over time. In contrast, the NPIs are a subset of the schooling-related activity undertaken by jurisdictions and are based on the term of the NSRA – any impacts resulting from the NPIs will be difficult to attribute within system-wide measures, given the myriad of reforms and other factors that influence student outcomes.
- **The relationship between the outcomes or sub-outcomes and any agreed future NPIs or other activity under a future national agreement.**

The Commission has proposed measures and outcomes in advance of detail as to what activities may be included in the future agreement once negotiated. Being prescriptive at this stage may limit alignment between the policy intent of the agreement and its future NPIs and the outcomes measured in its performance framework.

- **The rationale to continue use of broad whole-of-system measures within the NSRA.** Retention under a future agreement of system outcomes and sub-outcomes measured through system-wide performance metrics would appear to preserve the current duplication of the MFSA.

Instead of using system-wide performance metrics, a tailored, evaluative approach to assessing progress of individual initiatives of a future national agreement (including via non-quantitative measures) is more consistent with the principles proposed in the Queensland Government's initial submission and reiterated earlier. Given the many other accountability mechanisms already in place, and that NSRA activity is a minority of the activity in the schooling system, an evaluative approach would instead focus a future agreement's outcomes and subsequent measurement specifically on those activities committed to under that agreement.

The Commission's recommendations regarding improvements to the MFSA are also noted. The Queensland Government will consider all proposed MFSA changes collaboratively with other education ministers via the national committees, as part of the upcoming cyclical review by the Australian Curriculum, Assessment and Reporting Authority.

CURRENT NATIONAL POLICY INITIATIVES

The Queensland Government acknowledges the Commission's preliminary 'high-level' assessment of the current NPIs and its suggestions for a way forward.

Prior to finalising its assessment of the NPIs, the Queensland Government would welcome the Commission's advice on the specific learnings that can be shared from the process of agreeing and implementing the NPIs in the current agreement, including the process for selection as well as factors influencing progress to date. Noting the review terms of reference specify that the final report should include recommendations to inform the design of the next agreement, further consideration



by the Commission of the practical learnings from the current NPIs would be valuable for Ministers' information.

In this context, we particularly note that the current NPIs were not selected as a coherent package, resulting in a lost opportunity to pursue a strategic national agenda through the NSRA. Selection of the NPIs occurred in the context of a high-risk deadline and concurrent to complex funding negotiations under a new legislative framework. The limited time available for consideration of the NPIs meant the selected NPIs were not fully developed, scoped or costed prior to their agreement. In order to manage the risk of NPI costs escalating or work moving in unintended directions, each of the NPIs had negotiated milestones or 'gates'; building in a mechanism for parties to decide whether to move the initiative forward, as more information became available.

Schedule B of the NSRA outlines the milestones for each NPI, and specifies:

Implementation and timing of milestones is subject to [EMM] considering and agreeing the cost and cost sharing arrangements, scope and governance of each national policy initiative, acknowledging the different local contexts and starting points of each jurisdiction.

The NPIs were agreed to be developed iteratively and considered critically at key junctures. This is a significant feature of the agreement given its extended term, during which the priority and shared value proposition of some NPIs have been diminished or superseded by progress made by individual jurisdictions pursuing local priorities, as well as broader technological innovations.

The Commission may also consider the direct impacts of the COVID-19 health pandemic on the implementation of the NPIs. At the outset of the pandemic, Education Ministers prioritised critical functions, and the activities for a number of NPIs (including consultations) were suspended while the education sector focused on the immediate challenges of a national response. The disruptions of the pandemic resulted in delays to the NPIs, but also presented opportunities through rapid technological developments to support online learning. The limited flexibility of the NPIs to easily incorporate these innovations may present another learning for consideration.

For those NPIs still underway, Ministers are continuing complex deliberations, which necessarily balance the proposed benefits and value propositions of the



given NPIs with the needs and interests of students, teachers and schools and implementation feasibility, state-territory government duty-of-care responsibilities, and substantial initial and ongoing costs (particularly for those requiring technical solutions).

Ministers are best placed to determine how to progress the current NPIs, and will do so in the context of national collaboration, emergent and ongoing education policy priorities, and innovations since the NSRA's commencement.

CONCLUSION

The Queensland Government looks forward to continued engagement with the Commission throughout the remainder of this review, and to considering the Commission's final recommendations for the future national agreement.