



Australian Capital Territory Principal's Association (ACTPA)

## **Submission on the National School Reform Agreement- Interim Report**

**October 2020**

Thank you for the opportunity to respond to this important review.

ACTPA represents government school principals in the Australian Capital Territory and their 90 schools. Our members acknowledge the breadth and depth of this work, and the significance of the contribution of diverse stakeholders.

Almost weekly, we see headlines stating that education is in 'crisis'. Whether these are correct is a matter of conjecture but the sensationalism and regularity surrounding them highlight a growing awareness that maintaining the status quo is not acceptable. ACTPA recognises the need for urgent action. In this submission we provide overarching responses, more generally for education, as well as those set out for each section.

### **Overarching response:**

- A. Under the Terms of reference (iv), the report states 'ongoing implementation of these shared commitments remains a condition of funding...' and yet it is quite clear in the report that ongoing implementation is not the case, often in relation to larger states not having the same expectation laid upon them compared to the smaller ones.

ACTPA urges the Review Panel to bring clarity around these expectations: either the Commonwealth is trusting states and territories to implement the spirit of the reforms in the context of their schools, therefore with a tacit acknowledgement it will look different, or there is a firm outcome everyone must meet. This clarity is important as, with federal oversight over 8 distinct education systems, with the added complexity of public, catholic and independent schools all receiving commonwealth and state/territory funding, it is important for jurisdictions, sectors, and individual schools to work within the mandates otherwise there is little point in having them.

- B. The Terms (iv) also state 'the objective of the NSRA is that Australian schooling provides a high quality and equitable education for all students.' However, funding is not part of the scope of the review. This is incomprehensible. How can we address equity and not include funding? Whilst bureaucracies might like to separate the two, it does not make sense. There is inequitable funding across our schools which this report identifies. How can the federal government justify continued funding of independent schools at a rate higher than public schools? The Commonwealth might point to the states and territories, but that is passing the blame, not resolving the problem. How can we accept that the school resourcing standard, as identified by Gonski, is still many years away from full implementation? We urge the Review Panel to recommend the cessation of the review at this point, with the Terms of reference amended to include the funding model for states/territories and different sectors

to ensure high quality and equity in the next NSRA. Moral fortitude is required to address this.

- C. It is a widely-held view amongst school principals that COVID-19 has tested the limits of education in a way that was unthinkable prior to 2020. The fact that schools have coped through this period is, we contend, mainly due to the personal commitment of school staff, and parents in their communities, collaborating implicitly and explicitly to 'make it work'. Often, communication and decisions at Commonwealth and state/territory level have been made without consultation or representation from schools and school leaders to ascertain how particular outcomes will be achieved at the school level. This has added exponentially to the stress and workload of school staff, contributing to their shortage which this report confirms. For reforms to be successful, those implementing them need to be at the decision-making table. Peak Associations, including APPA, AGPPA, and ASPA should not merely be requested to respond; they should be invited to attend. This will go some way to ensure we are looking at the priorities that will make the most difference to students, aligned with the ability and commitment to enable them in schools. Principals often see well-intentioned reforms stumble for some of the most basic reasons. Information request 3.1 (p.82), for example, looks at intensive, targeted support for students who have fallen behind. If the answer is yes (and ACTPA supports this model in principle), then before the policy is enacted other questions need to be asked and answered, for example: do schools have a physical space for this? Is this funded for teachers to run or paraprofessionals? Where will these teachers or paraprofessionals come from? Do schools have flexibility in the programs they are delivering? Principals at the decision-making table are not there to stymie reforms. We are there to ensure the successful implementation, and any unintended consequences from these decisions, are considered.
- D. Moving forward, we must distance ourselves from references such as 'the new normal', understand the profound impact felt in schools during COVID-19, and recognise we may not be at the 'new normal' or the 'old normal' stage yet. We are certain the effects of the school disruptions, added workload, and sheer intensity of the roles of school staff, even with very limited disruptions from this point on, will last for many years and result in continued staff shortages, increased interventions to support students, and overall fatigue in those remaining in schools. Therefore, expectations from these reforms need to be revised accordingly on two levels. Firstly, accountability measures in schools need to be streamlined and holistic. Maintaining the status quo has already shown to cause a drift of staff away from a career in education. Secondly, increasing expectations on the educational bureaucracies in each state and territory does not support schools, as these bureaucracies often recruit from school staff looking for a career change. There needs to be close consideration of any new policy initiatives which add to the workload of schools, or the bureaucracies that support them, as schools need higher levels of resourcing, time and space to recover sufficiently for their successful implementation.
- E. There has been a varied, and inconsistent, response from the community sector over the last three years to support students in need. ACTPA is concerned by the quantum of funding taken by allied health professionals to support students, the waiting times, the inability to have communication responded. For every story a principal can tell of a wonderful experience with the broader community, including those with Commonwealth or state funding to support students, there will be at least two or three more where the experience has been less than optimal. The role of the community sector, and their integration with schools, needs to be investigated further.

We ask the Review Panel to reflect the points above and below in their recommendations to support the ongoing education of our students based around equity and excellence.

## **Specific responses:**

### **Section 2: High-level assessment of the National Policy Initiatives**

The seven National Policy Initiatives are referred to by the NSRA as 'key enablers that drive improvements in educational outcomes'. These are bold claims, especially as the Review states their progress has been 'disappointing'. Is the online formative assessment initiative there to support growth in student achievement, or another guise to ensure accountability? Schools already have many tools and opportunities to formatively assess student progress, so we ask if this is a right enabler to be investing in? We appreciate the need for nationally consistent data collection but, due to the costs to schools and governments, we support sample testing as an alternative.

The teacher workforce review is assessing many options, though has yet to provide concrete action. On the ground, this effort is yet to address the intense workloads and a low ebb of the status of the teaching profession. Uncompetitive salaries play a strong part in this. We call for timely and productive action through the NSRA.

The Unique Student Identifier (USI) is classified in the Review as 'a new, unique and rich data source to inform policy'. We argue this misses the potential and is the wrong enabler. To support excellence and equity, the USI should be used as a process of ensuring our most vulnerable and at-risk children can be tracked across states and territories to reduce the likelihood of them falling between the cracks of our child protection systems.

There are many existing opportunities for research evidence to be disseminated in schools which schools utilise. AITSL, professional associations, universities, social media influencers and edu-celebrities all provide this in degrees of differing quality and accessibility. Often, schools are drowning under the weight of this evidence. Having another organisation providing this is the wrong investment.

Improving national data quality seemingly implies that more data is beneficial, inexorably moving closer to the McNamara Fallacy where we are measuring what is easily quantifiable and justifying its importance. Simultaneously, we are not looking at the rich detail we know about our students. There is plentiful evidence suggesting that the future prosperity of Australia relies on our creativity and adaptability, not our ability to constrain our students into narrow markers of success. Again, it is the wrong enabler.

ACTPA requests the Review to reconsider the relative importance of these initiatives. We suggest that the limited success of their implementation so far could be due to an unspoken agreement amongst stakeholders of their (in)significance.

### **Section 3: Lifting outcomes for all students**

ACTPA agrees with the overarching sentiment of this section, particularly key points one, two, three, four and six. We disagree with the ethos of the fifth point around implementation plans being in place to serve transparency and 'hold parties to account'. We feel this should be framed around how we support those affected groups, not emphasising another avenue of accountability. When the scope of the review places resourcing of schools to support priority equity groups outside of its remit, ACTPA argues that whatever answer is produced will be insufficient. Therefore, we reiterate our desire that the review is suspended, and the Panel recommends to the Commonwealth that funding is included from this point forward. ACTPA also agrees in principle with the draft findings in this section and that:

- More needs to be done to support the three priority equity groups (Indigenous, rural/remote/regional, and low SES)
- Notwithstanding the above, generalising the above is equally unhelpful as this casts all those in the cohort as 'disadvantaged'
- The identification of and definition of 'disadvantage' needs to be clarified as many students are disadvantaged to a higher degree than the priority equity groups but are excluded from this picture. We agree that students living in out-of-home care and students with EALD should be included whilst requesting a broader investigation of the needs of students who are not recognised under the existing processes, for example, children with trauma. We also propose an investigation into the formal identification of students requiring additional supports as the existing system relies on parents accessing psychologists, speech therapists etc. to make the diagnoses. This raises issues of equity (those who can afford the shorter waiting list of private providers over government assessments) and timing (waiting lists for allied health can stretch into years, even if you can be registered on the list for some specialised services). Meanwhile, schools are doing the heavy lifting to support these students.

#### **Section Four: Student wellbeing**

ACTPA agrees that student wellbeing should be included in the next intergovernmental agreement on schools. However, this should not be at the expense of teacher or school leader wellbeing. Therefore, we urge the Review Panel to refrain from suggestions of continued teacher professional learning on supporting wellbeing, changes to the curriculum to incorporate wellbeing further etc. The response to a drop in wellbeing needs to be nuanced, one where the burden is not felt by schools in the implementation of, ongoing commitment to, and responsibilities to report on the initiative. This will ultimately cost more as it will involve programs not run by existing school staff, or increased levels of resourcing to reduce the oppressive load on schools in other ways. We appreciate the important roles schools have in identifying and addressing poor student wellbeing. Our point is schools need greater supports to tackle this effectively

On p.110 and p.111, the report lists nine policies governments have which support student wellbeing, the majority of which fall on the shoulders of already over-burdened professionals in schools. These won't be successful in the long term as schools just cannot keep taking greater responsibilities on. On p.113 the report lists five ways teachers and students lack access to the support and resources they need. It appears to ACTPA that the wrong question is being asked here. We refer you back to the third dot-point ('teachers feeling overloaded with the expectation...') to guide your response. As the peak body for public-school principals in the ACT, we fully understand the desire for transparency and accountability, but we ask for greater thought regarding a(nother) measurement tool being introduced in schools which it can be foreseen will impact wellbeing negatively. Again, without addressing the wellbeing of staff in schools, you will not achieve these outcomes for students.

#### **Section Five: Supporting teachers**

Our members report an ongoing and growing teacher shortage. This is seen in the following ways:

- Fewer applicants for vacancies
- The general quality of skills and/or dispositions of applicants falling
- Fewer available relief teachers
- The general quality of skills and/or dispositions of relief teachers falling
- More 'split' classes as we do not have sufficient staff to cover when a teacher is away
- Reduction of staff attending professional learning as covering their classes is difficult
- Classes cancelled in the college sector (Years 11 and 12 post-compulsory education)

- School leaders covering classes out of necessity, above their expected teaching load

We agree with the empirical evidence cited on p.138 (Gore et al., 2015) by the Panel but feel the emphasis placed on the intrinsic factors by many commentators is intended to divert attention away from the extrinsic factors. It seems clear that teacher and school leader salaries are a sticking point; increasing school funding does not seem to be a popular option or an easy one to make (otherwise jurisdictions would already have done this). However, some things to bear in mind:

1. Occupational violence is a very real risk, or event, in the daily lives of many who work with children.
2. A populist view is we finish the day early and have long holidays. Whilst that seems to have almost been eradicated, what is rarely acknowledged is the intensity of the work, the weight of expectation felt from the community, the worry about not doing enough to support a child, the counselling of the parents through their problems to indirectly support the child.
3. The workload has become extreme, often to the detriment of our personal relationships.
4. Induction and mentoring processes need to be improved to ensure consistency within and across schools. At the moment, the quality of induction and mentoring of teachers seems to be heavily dependent on 'luck'.
5. Schools are regularly seen as the solution to society's ills. Whilst we are part of the solution, we are not the solution.

Many outside of teaching would not accept one of the points above in their workplace, let alone all. Despite this, we believe, regardless of the best intentions, legislation and policies, it will be difficult to change the above in the short term. Therefore, if it cannot be changed, remuneration, along with structures to support all staff who work directly in schools, needs to be put in place. Quality teaching, and quality school leadership is not a cost. It is an investment in the future of our country and the economy.

ACTPA is also concerned with Draft Recommendation 5.1 (p.146) regarding workforce demand and supply data. With respect, this seems a bureaucratic excuse for not acting sooner. Principal bodies and industrial representatives can provide you with this data in a matter of weeks.

## Section 6: School leadership

ACTPA applauds the Panel for recognising the critical role school leaders have leading across all areas of their school and the supports (both direct and indirect) they provide to students, parents and often the broader community. We also appreciate the acknowledgement and understanding of the complexities of our role. Regarding information request 6.1 (p.177), these are our responses:

1. *Do principals have the resources, support and professional development opportunities required for their demanding roles?* No. These can be created based on budget allocations within schools but there is an opportunity cost to this, often between student resources and professional learning. Many early career principals will not look to develop themselves due to a fear of how this will be interpreted by others. State/territory education systems have processes in place, but we understand there is a high degree of variability in what is offered, and in the quality of what is received.
2. *Are policy efforts to identify and prepare potential leaders effective?* No. Despite the best efforts of leadership development programs, the complexity and demands of the role are not always evident until you commence as a principal. Policies which identify and prepare potential leaders has the risk of 'teaching to the middle', stifling principal creativity, inspiration and ways of thinking 'outside of the box' at a time when these assets are essential.
3. *Are there alternative sources of school leaders, including from outside the teaching profession?* No. The work of schools is too complex, the risks from principals who do not

understand the basic tenets of leading an educational setting too profound. The role of coordinating professionals to support a child with complex needs is a skill set that can only be fully developed by a deep understanding of education. However, considering the legislative and compliance responsibilities schools have, additional resourcing to enable those with the requisite skills to manage non-educational complexities, in partnership with principals, is an avenue that has merit and should be explored further.

4. *What are the merits of a nationally coordinated approach to supporting a pipeline of future school leaders?* Not at this point, far greater consideration and debate is required and can be led through the professional associations of principals.

Once again, we appreciate the opportunity to respond to the draft National Schools Reform Agreement interim report. We hope the responses above will help guide the future directions of governments to support students, and the schools which play a pivotal role in their development.

We look forward to the opportunity to discuss this further.

Yours Sincerely,

Wendy Cave, Lyndall Read, Andy Mison, Steve Collins and Chris Jones

**ACTPA Executive**