



Association of
Independent Schools
of South Australia

1. Background

The Association of Independent Schools of South Australia (AISSA) welcomes the opportunity to respond to the Review of the National School Reform Agreement Interim Report. The AISSA is the peak body for the Independent school sector in South Australia. It provides a forum for debate on key policy issues and plays a significant leadership role in providing advice and information, representing individual schools and the sector, and shaping change and improvement in school education.

Independent schools provide choice, diversity, innovation and excellence in education. They educate students within a curriculum underpinned by a diverse range of religious beliefs (Anglican, Baptist, Christian, Christadelphian, Greek Orthodox, Islamic, Lutheran, Seventh-day Adventist, Uniting) and educational philosophies (Montessori, Waldorf Steiner). The sector also includes a number of secular schools, special assistance schools and two special schools which educate students with severe disabilities.

Nearly 20% of the state's children are educated in Independent schools, with higher percentages in the secondary and senior secondary years. Approximately one-third of Independent schools are in regional South Australia and two schools are located in remote areas. The majority of schools cater for students from Reception to Year 12, with one-third providing primary school education only. The South Australian Independent school sector is characterised by 70% of schools with a DMI score of less than 100. This sees a significant proportion of schools across both metropolitan and regional areas educating students from lower socio-economic backgrounds.

The addressing of educational disadvantage is an absolute imperative across South Australia. The State has faced a number of significant economic challenges including impacts arising from the closure of large manufacturing industries, drought, bushfires and most recently COVID-19.

2. Overview

The Commission has identified four overarching and interrelated policy challenges facing Australia's school systems. While the worth of these high level policies is recognised, the AISSA has significant concerns with specific details described in some of the Interim Report's recommendations, which we consider will not address their intended issues and will place an unsustainable reporting burden on schools and school authorities.

The AISSA notes the Commission's request for stakeholder views on enhancements to accountability measures and the Report's focus on increasing accountability measures. The AISSA strongly opposes additional regulatory burdens being placed on individual schools which are not evidenced based and distract from the core business of schools – educating students. External accountability will not, in itself, drive improvement. The worth of a measure is in its capability to facilitate appropriate and contextual responses that best address individual school, and student, circumstances and contexts.

Additionally, the AISSA considers that there is a disconnect in the report between the recognition of the complexity of addressing educational disadvantage, the proposal for a finer-grained measurement approach, and the focus in a number of recommendations, on increasing reporting and standardisation.

The AISSA is supportive of the continued focus on factors that positively influence student outcomes that are amenable to intergovernmental collaboration. However, there are enormous risks inherent in an approach that is underpinned by tighter measurement of a multitude of fine-grained national priorities.

3. Future funding for NGSRBs

While it is noted that funding is outside the scope of this inquiry, it is nonetheless essential to recognise that, for the Independent school sector, the Reform Support Fund (RSF) has been a critical driver to facilitate the progress of national priority areas and corresponding state reform initiatives. These funds have enabled the AISSA as a non-government school representative body (NGSRB) to deliver high quality and effective additional programs, and through the AISSA, each Independent school has played an integral role in progressing national and state education reform activity, as described through annual reporting processes.

The provision of RSF to NGSRBs enables this assistance to occur in a targeted, efficient and effective manner across the Independent school sector. The ongoing certainty of support through the RSF has enabled the NGRBs to refine program delivery based on analysis of previous reform activity, feedback from Independent schools and in response to the changing contexts within which schools operate.

Although significant gains have been achieved, this work is ongoing. The funding received through the RFS to NGSRBs continues to be an essential resource moving forward and any reduction in this funding will have a consequent impact on the ability of non-government schools to progress reform.

4. Recommendations and Findings

The AISSA response addresses the key findings as outlined in the Interim report as they apply to the South Australian Independent school sector.

Recommendation 2.1: Parties to the NSRA should fulfil their commitments to deliver key National Policy Initiatives.

Recommended actions include:

- *Agreeing the design and privacy protections of a USI. If parties cannot deliver a national USI, they should, at a minimum, explain why they have been unable to do so*
- *Developing the national online formative assessment tool in a way that enables jurisdictions to adapt the tool to their needs and preferences (including using content and features from their own formative assessment tools)*
- *Developing a national model of the teacher workforce to support workforce planning.*

The AISSA recognises the implementation of the USI as a key national policy initiative, and also notes that the slowness of progress has been compounded by complexities such as legislative change and privacy obligations.

The focus on the implementation of the USI pilot across a small group of Independent schools from three jurisdictions in early 2022 was limited in scope, and excluded third-party Student Management System Vendors, who interface with the majority of Independent schools. To date, the AISSA is not aware of any progress made with these vendors. This poses a significant risk to successful implementation for Independent schools.

The operational elements of implementing a USI are in many ways the easiest to progress. Of more significant concern is the articulation of the parameters about the intended immediate and future uses of the USI, especially with regard to data linkage and the use of data for research purposes.

While cognisant that the work of the Australian Education Research Organisation (AERO) is still in its infancy, this independent education evidence body is already a key repository for high quality evidence that is relevant and accessible for all levels of Australia's education community.

Recommendation 3.1: Implementation plans, developed in consultation with affected groups, should be used to improve the transparency of reform actions and to hold parties to account for the outcomes they commit to achieve.

In the next intergovernmental agreement, Australian, State and Territory Governments should ensure:

- *There are reforms directly addressing the barriers and ambitions of students from priority equity cohorts*
- *Bilateral agreements, developed in consultation with stakeholders, identify how jurisdictions will lift outcomes for students in each of the priority equity cohorts identified in the agreement, recognising their specific learning needs*
- *Progress reporting contains sufficient information (and has sufficient oversight) to provide the public with confidence that measures to lift outcomes for students in priority equity cohorts are being implemented and achieving their intended outcomes.*

The AISSA strongly supports genuine evidence-based education reforms which will lift outcomes for all students experiencing educational disadvantage and has embedded a range of strategies to assist schools in the programs offered to South Australian Independent schools which are supported by the Australian Government Reform Support Fund and contribute to the Bilateral agreements.

The interim report, importantly, recognises that priority equity groups are not homogenous and that students within these groups have individual needs and contexts which are often masked by the priority group label. The report further acknowledges feedback that this labelling can lead to a deficit mindset being applied to education strategies to address the educational disadvantage that students, within these priority groups, can experience. Moreover, as the Report indicates, achievement gaps are found across the student spectrum and are not confined to equity cohorts.

Hattie's research into educational outcomes has demonstrated that a focus on excellence is key to improving outcomes for all students (Hattie, 2018). This is embedded in the AISSA's program delivery design which focusses on programs that maximise sustainability across school contexts while recognizing that additional targeted support is required by some students.

Schools are complex environments, with multiple stakeholders and frequently changing school personnel. It is essential to acknowledge that creating long term change for students in priority groups and embedding skills and capacities within schools requires ongoing sustained support.

As recognised by the Commission, educational disadvantage is often the result of a range of complex inter-related factors which often include factors beyond the control of schools. The Report's focus on measurement of targeted groups, while understandable, obscures this complexity and the fact that schools supporting students experiencing disadvantage do not have the luxury of confining their focus to what occurs within the school grounds. To enhance outcomes for students within priority groups there is a need for a whole of government and community commitment to addressing disadvantage.

The AISSA would be supportive of a continued focus in the Bilateral Agreements on factors that positively influence student outcomes and are amenable to intergovernmental collaboration. In South Australia there is a significant history of cross-sector collaboration, where that collaboration is in the best interests of students and education in general. However, there are enormous risks inherent in an approach that is underpinned by tighter measurement and a multitude of fine-grained national priorities. There is a further danger that an outcome of a focus on the inclusion of targeted intensive support will lead to a standardisation of approaches which will not meet the individual needs of the students.

Recommendation 4.1: Governments should incorporate wellbeing in the next intergovernmental agreement.

In the next intergovernmental school reform agreement, the Australian, State and Territory Governments should:

- *Add improved student wellbeing as an outcome*

- *Include local actions that would improve student wellbeing and indicators of progress in bilateral agreements or implementation plans*
- *Collect data on student wellbeing from all schools to enable annual reporting on a national measure of student wellbeing.*

The Mparntwe Education Declaration states that education must support the wellbeing, mental health and resilience of young people and with appropriate funding assistance, the AISSA would be most supportive of a high-level wellbeing outcome in the next intergovernmental school reform agreement. The AISSA is ideally positioned to support the implementation of local actions and is a key connector between Independent schools and other sectors and agencies.

External accountability will not, in itself, drive improvement. The worth of a measure is in its capability to facilitate appropriate and contextual responses. Currently a plethora of tools to measure wellbeing exist, each with its own nuanced focus. Any collection of student wellbeing data through a national measure will need to be premised on a clearly articulated and research-based definition of wellbeing, accompanied by valid and reliable instruments. It must be recognised that a significant point of difference to the current national assessments for Literacy and Numeracy (NAPLAN) is that this information will be self-reported by students themselves.

Many current wellbeing tools are expensive to implement. Without systemic financial support, the cost of implementing a national test will fall on individual Independent schools.

Recommendation 5.2: Reducing teacher workload should be a focus of the next agreement.

In the next agreement, the Australian, State and Territory Governments – in consultation with teachers and school leaders – should develop a new National Policy Initiative that commits all jurisdictions to undertake an assessment of teacher and principal time use. This could involve a four-step process, whereby Australian, State and Territory Governments:

- *Commit to an assessment of teacher and principal time use across school sectors, with a focus on identifying how teachers and principals spend their time, and what tasks they rate as low or high value*
- *Specify how they will remove low-value tasks, duplicate tasks and regulatory inefficiencies*
- *Specify how teaching assistants can be best deployed, including to reduce teacher workload*
- *Monitor the compliance and administration burden on teachers and principals over time*

The AISSA strongly opposes standardising the codification and/or measurement of teacher workload. The Educational Services (Teachers) Award 2020 ('the Modern Award') does not codify teacher workload beyond specifying the maximum numbers of days for teaching and their average weekly hours over a 12 month period. Across South Australia a range of diverse enterprise agreements apply at sector level/s and also at the individual school level. The flexibility, operational and learning responsiveness this allows is highly beneficial. The rigid measurement and codification of teacher workload in enterprise agreements would actually limit the flexibility of responsiveness at the school level as it would not take into account the differing needs of individual teachers across varying learning areas, specialities and career stages. Independent schools offset teacher workload expectations with other flexible allowances, that best fit specific school environments. The AISSA believes that a one size fits all approach to codifying teacher workload poses significant risks for teacher satisfaction.

School Support Officers (SSOs) and teaching assistants play an important role in supporting students by applying a range of teaching and learning strategies under the direction of the classroom teacher. In order for this to be successful, it is important that these staff are properly equipped with the necessary knowledge and skills to do this effectively. Recognising this, the AISSA has provided opportunities for SSOs to undertake further education by completing the Certificate IV in Education Support qualification. This opportunity provides SSOs with essential, practical and research-based techniques, strategies and skills required to effectively contribute to students' learning and development. This includes supporting students with diverse needs, including disability. The AISSA believes that schools are best placed to make decisions about how teaching assistants are deployed and moreover it is the building of staff expertise that will best contribute to lifting outcomes for students and correspondingly, influence teacher workload.

Recommendation 5.3: Encouraging highly effective teachers and maximising their value.

In the next agreement, Australian, State and Territory Governments should work together, in consultation with teachers and school leaders, to:

- *Develop and support localised communities of practice across schools, regions and sectors. These should encompass accessible options for time-constrained teachers as well as subject specific options to support those teaching out-of-field*
- *Ensure that Highly Accomplished and Lead Teachers are trained, and deployed as intended, to lift the quality of teaching across schools and sectors*
- *Streamline processes for becoming a Highly Accomplished and Lead Teacher, including by recognising prior competencies.*

The national certification process for Highly Accomplished and Lead Teachers (HALTs) is to be celebrated as a recognised and endorsed mechanism that promotes and develops teacher quality against national professional standards. A cross sector approach to certification in South Australia has seen the number and range of teachers who have intentionally worked to improve their teaching practice and expertise steadily grow.

Measures to streamline or dilute these processes must be approached with caution, as it is this rigour that lifts the expertise of the profession. It also sends a dangerous message of dilution of standards to those teachers who have already successfully undertaken national certification and renewal of certification processes. HALTs influence and build professional practice within and across their school's sphere, contribute to professional bodies and play an integral role in undertaking additional key roles including mentoring early career teachers and leading innovation and improvement initiatives in their schools. It is essential that this remains a high quality process.

Finding 6.1: Improving school leadership can have large impacts on students' learning. School leaders are second only to teachers in fostering a positive learning environment. Improving the effectiveness of leaders, especially principals, would generate sizable benefits.

Recognising this critical lever, the AISSA is committed to sustaining the focus on school leadership as a core means of enhancing the learning and achievement of all students. Renowned educational leader, Professor David Hopkins, has shown that when leadership is instructionally focused and widely distributed, to both raise standards and build capacity, then both teachers and students are better equipped to learn and achieve (Hopkins, D 2022).

Across the diversity of the Independent sector, the AISSA is well equipped to support school leaders to be firm in their vision, lead teaching and learning and additionally, develop professionalism and capability within individual schools. Moreover, the AISSA plays a key role as a conduit in supporting effective cross-school networks to learn, collaborate and share outstanding practice.

Recommendation 7.1: The performance reporting framework of the next agreement.

In the next intergovernmental school reform agreement, Australian, State and Territory governments should:

- *Commit to public reporting on each outcome by jurisdiction for students with disability, Aboriginal and Torres Strait Islander students and students in regional, rural and remote areas*
- *Add new sub-outcome measures for learning gain, post-school outcomes and the measure of student wellbeing proposed in draft recommendation 4.1*
- *Update the NAPLAN sub-outcome measure to use proficiency standards rather than learning bands.*

The AISSA strongly supports public accountability, however, we do not agree that finer grained measurement of priority groups at the jurisdictional level will lead to improved outcomes. A key strength of the Independent school sector is its direct accountability to its school community.

Recommendation 7.2: Review of the Measurement Framework for Schooling in Australia.

ACARA's next review of the Measurement Framework for Schooling in Australia should:

- *Create a performance indicator framework aligned to NSRA outcomes and sub-outcomes to which Key Performance Measures are mapped*
- *Consider the inclusion of system performance Key Performance Measures relating to the teaching workforce*
- *Consider the inclusion of additional contextual information relating to influences on learning based on Australian Early Development Census data and information on English language proficiency*
- *Deliver improved reporting on outcomes for students from priority equity cohorts*
- *Be undertaken in consultation with students, teachers and communities*
- *Document remaining gaps.*

The National Report on Schooling in Australia should be tabled annually in Parliament.

ACARA should work towards filling reporting gaps by exploring the use of State and Territory Government data that are comparable over time, even if it is not nationally complete or comparable across jurisdictions. Well established State and Territory Government surveys of students, parents and carers, and teachers should be given due consideration.

It is disappointing that, despite recognising the complexity of addressing student disadvantage and the burdens placed on school staff that distract from the core focus of teachers, the proposed approach still focusses on fine-grained measures which increase regulatory burden. The AISSA considers that the current measurement framework is fit for purpose and provides an appropriate balance between the need for accountability for the use of government funding and not placing an unsustainable burden on schools. It is not clear what purpose beyond increased data collection the change to the measurement framework would achieve. External accountability does not, in itself, drive improvement. The worth of a measure is in its capability to facilitate appropriate and contextual responses that best address individual school, and student, circumstances and contexts.