

19 October 2022

National School Reform Agreement Review
Productivity Commission
Melbourne Australia

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Interim Report of the Productivity Commission – Review of the National School Reform Agreement

Thank you for the opportunity for the **Australian Child Rights Taskforce** to continue to contribute to this review process. We have made an initial **submission to this review** dated 24 June 2022. We have now reviewed the **Interim Report of the Productivity Commission** dated September 2022.

We reinforce the key messages of our initial submission. We will make some additional observations to indicate our support for some of the findings of the Interim report and to develop some of our key messages that we believe have not been sufficiently addressed by the Interim Report.

The Australian Child Rights Taskforce and the child rights approach

Our initial submission introduces the Australian Child Rights Taskforce, its role, its commitment to the implementation of the *United Nations Convention on the Rights of the Child* (the Convention) and its interest in education policy and practice. This further submission has again been prepared by the Taskforce's Policy Working Group. Our processes are consultative and draw on the experiences of children and young people and those who work with them across a range of sectors and communities.

Our initial submission also describes the importance of a child rights approach in education policy and practice in Australia today. We continue to endorse the work of the Gonski reviews and the guidance that they provide. To the extent that the work of those reviews has not been followed, we call for a renewed commitment by Australian Governments.

We believe that many of the underlying issues addressed in this review continue to require equity in funding and in providing school education; and for school education to support individual student learning more effectively. As stated in our initial submission, this reflects an authentic child rights approach: to ensure “the education of the child shall be directed to the development of the child’s personality, talents and mental and physical abilities to their fullest potential”.¹

The Interim Report has identified the need for ongoing coordination across government and portfolios. This should be based not on bureaucratic convenience but a clear commitment to understand and support all aspects of a child’s experience. Health and wellbeing², protection from violence, fairness and participation are among the rights that must be addressed for the effective realisation of the right to education.

¹ Article 29, United Nations Convention on the Rights of the Child

² “A community engaged primary healthcare strategy to address rural school student inequities” (2018)
Primary Health Care Research & Development

Measurement of Performance

We maintain that measurement of school education performance must be comprehensive, coherent and child centred. We must be able to measure the ongoing engagement of all children with the school education system (including access to and the efficiency of alternatives to mainstream schooling). We must be able to hear how to improve the school education system through the experiences and voices of children and include their views and perspectives in the measurement of school reform and educational progress and achievements.

The failure of governments to reach agreement on nationally consistent tools for measurement is not acceptable. We would encourage the Productivity Commission to be more forceful in its recommendations around measurement. If agreement cannot be reached, independent assessment should be implemented. There should be penalties and public reporting to drive the requirements of the provision of data to record and measure the performance of school systems.

The consequences of the failure on the part of governments to provide effective measurement should not be visited upon schools, teachers, or students. Ultimately it is our view that it is the responsibility of the national government to ensure accountability in reporting.

Broad Stakeholder Engagement with Children and Families at the Centre

The Interim Report does not propose the broad engagement that is required to implement the intent of the National School Reform Agreement. There should be greater attention given to ensure collaboration and consultation with all relevant stakeholders, including children and young people, their families and communities, schools and teaching and support staff.

It is our view that the Interim Report should recommend that the measures and targets should incorporate and reflect the experience of children and young people. We note that the Interim Report seeks further information about matters relating to these issues. The Agreement and its targets should be amended to effectively understand and support improvements to student wellbeing and experience.³

We acknowledge the importance of workforce development and support for teachers who are critical to student and school performance. However, national education policy requires attention to a broader range of issues including listening to and considering the experience of children and young people (including those who are not consistently engaged with the school experience).⁴

In our view the National Measurement Framework for Schooling in Australia and the National Policy Initiatives would be more effective in supporting the objective of the National School Reform Agreement if developed and adapted to address these issues.

Once again, the Taskforce supports the further submission of Save the Children and 54 reasons to this review and recommends attention to its research and analysis. We share its concern for greater attention to be given to measures of student wellbeing, voice, accountability, and engagement.

³ 'Enhancing students' social and emotional development promotes success in school: Results of a meta-analysis', (2011) Child Development 82: 474-501

⁴ "Educational opportunity in Australia 2015: Who succeeds and who misses out, Mitchell Institute; Centre for Adolescent Health; "Children and young people disengaged from education" (2019) Social Ventures Australia

Comments on Interim Report Findings and Requests

We note with support the Commission's draft finding 2.2: *'The National School Reform Agreement has weaknesses that undermine its effectiveness in facilitating collective, national efforts to lift student outcomes'*. As discussed earlier, we believe that more rigorous and extensive efforts should be undertaken to improve **accountability** under the Agreement and future agreements.

As proposed by Save the Children and 54 reasons, this should include more deliberate involvement of **student voice** at a system level and at a national level. This is a matter that could be addressed through consultation with the Australian Youth Affairs Coalition (and peak and other bodies representing students at State/Territory level where they exist), to strengthen and support student participation in education policy development.

We note and support the Commission's draft findings in relation to addressing the needs of groups of students including those that relate to issues of **equity, culture, disability, and location**. We support the draft recommendation 3.1 that detailed implementation plans, developed in consultation with affected groups, should be used to improve reform and accountability. This work should be undertaken alongside and in consideration of our suggestions for improving student voice and participation and the participation of affected equity groups. Once again, the inclusion of the Australian Youth Affairs Coalition and student representative bodies at State/Territory level in meaningful consultation and engagement would assist in addressing these issues and concerns.

We note and support the Commission's draft finding 4.1 and draft recommendation 4.1 to incorporate wellbeing in the next agreement. However, we believe that further attention is required to define, address and measure outcomes of **wellbeing**. There is a strong argument that the concept should include reference to health measures and outcomes. Efforts should be made to identify existing data sets in **health and welfare** that could add valuable information and insights.

This reinforces once again the importance of ensuring coordination between and across sectors and service systems. We reiterate from our earlier submission that the right to education requires coordination and commitment to all aspects of a child's experience. There should be opportunities for more effective coordination across existing national reform initiatives including:

- **The National Agreement on Closing the Gap**
- the **National Aboriginal and Torres Strait Islander Education Strategy 2015**,
- the **Nationally Consistent Collection of Data on School Students with Disability**,
- the **National Children's Mental Health and Wellbeing Strategy**,
- **Safe and Supported: National Framework for Protecting Australia's Children**,
- the **National Strategy to Prevent and Respond to Child Sexual Abuse**, and
- the implementation of the recommendations of the **Royal Commission into Institutional Response to Child Sexual Abuse** and the **National Principles for Child Safe Organisations**.

At a practical level, there is the opportunity for support for school level services and coordination through initiatives such as a National School Health & Wellbeing Nursing Service. This would be consistent with the recommendations of the Productivity Commission's 2020 Mental Health inquiry that the National School Reform Agreement to support 'improvements in student wellbeing' as an outcome along with the development of associated targets and measures.

Conclusion

Thank you for the opportunity to make a further submission to this review.

The Taskforce will continue to follow and support the work of the Productivity Commission in this Review and its other work in improving our systems and services.

Generally, we would support greater ambition in the Commission's final report in influencing the direction of reform and addressing the critical importance of school education for our children and Australian society.

Yours sincerely

On behalf of the Australian Child Rights Taskforce

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