

# Productivity Commission Review of the National School Reform Agreement

Queensland Government Submission





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## INTRODUCTION

The Queensland Government welcomes the opportunity to provide input to the Productivity Commission's review of the National Policy Initiatives (NPIs) and the National Measurement Framework for Schooling in Australia (the Measurement Framework). This review fulfils an important commitment under the National School Reform Agreement (NSRA), to independently assess the effectiveness of the NPIs and the appropriateness of the framework in measuring progress towards the outcomes of the NSRA. Its outcomes will provide a valuable additional input to support and inform Education Ministers in the development of any future national agreement.

This submission responds to the broad intent of the review, as scoped and agreed by First Ministers and as per the review Terms of Reference, focusing on the implementation of NPIs to date, with a view to informing improvements to approaches for future NPIs. It highlights the complexity and pressure under which the current NPIs were developed, the opportunity cost of the approach that was taken to current NPIs and the benefits of using a clear set of principles to select and design future NPIs. In relation to the Measurement Framework, the submission highlights the differences between the NSRA and the Measurement Framework, both in their origin and their purpose, and emphasises the key considerations for developing an appropriate measurement approach for the next national schooling agreement. The submission suggests principles that should be applied in determining and implementing national reforms, and, noting that these principles were also identified ahead of the current NPIs being agreed, highlights the opportunity cost of not applying such principles.

In completing their review, we ask that the Commission have due regard to the following considerations:

- **The activity set out in the NPIs represents a minority of the policy, reform and operational activities that Queensland is undertaking in relation to its schools.** The operation of Queensland's government and non-government schooling systems is a complex and ongoing activity that extends across a significant geographical footprint and encompasses widely varying

functions. Work on the NPIs is only a small part of Queensland's state education functions.

- **In addition, the NPIs do not represent the totality of cooperative action being undertaken across Australia in relation to education.** Substantial additional collaboration is occurring on an ongoing basis between jurisdictions and with the Australian Government (for example, NAPLAN Online and the new Australian Curriculum).
- **The Queensland Government does not receive funding from the Commonwealth to specifically implement the NPIs.** Work on the NPIs falls within the broad ambit of national funding arrangements, but there is no direct relationship between the NPIs and the recurrent funding that Queensland receives from the Commonwealth for the operation of its schools. Resourcing for collaborative development work and local implementation costs for the NPIs must be found from within existing state resources.
- **Education is a valuable lever for economic growth as well as an intrinsic and social good, and a human right.** The value of education to the economy is complemented by its value to individuals, families and communities, and this value is not always directly measurable. In Queensland, the passage of the *Human Rights Act 2019* entrenched a progressively realisable right of all students to have access to school education appropriate to their needs. This reflects the right to education set out in article 13 of the *International Covenant on Economic, Social and Cultural Rights* and its acknowledgement that education should be directed to the full development of the human personality, talents, mental and physical abilities to their fullest potential, and the sense of human dignity.

## Evidence for drivers of outcomes

In identifying drivers of academic achievement, engagement and skill acquisition, we refer the Commission to the 2018 report of the *Review to Achieve Educational Excellence in Australian Schools*. The panel for this review undertook a comprehensive literature review to arrive at its recommendations and focus areas. We also refer the Commission to the other documents referenced in the NSRA as having guided the agreement, particularly the Independent Review into Regional, Rural and Remote Education and the STEM Partnerships Forum.



For sector-specific research, the Australian Education Research Organisation (AERO), a national evidence body established by Education Ministers under NPI C(ii), may provide additional sources of evidence to support this review. AERO was established specifically to develop an education evidence base, and its seven priority research areas for 2021-22 were identified with consideration of both demand and impact, to focus on the areas of most pressing challenge and those most likely to improve excellence and equity in educational outcomes. However, AERO has not yet had an opportunity to fully deliver its planned work on these identified priorities.

## QUEENSLAND CONTEXT

### Demographics and geography

Queensland is Australia's second largest, but most decentralised mainland state. More than half of the population lives outside the greater metropolitan area of Brisbane, resulting in a geographically dispersed student population.

The Queensland Government owns and operates 1258 state schools, and financially supports and sets the conditions of operation for 544 accredited Catholic and Independent schools. The majority of Queensland's government schools are located outside metropolitan areas.

In 2021, Queensland schools enrolled 76,458 Aboriginal and Torres Strait Islander students, accounting for 8.8% of all students in Queensland (with the majority (82.1%) enrolled in government schools) and representing 30.7% of Australia's Aboriginal and Torres Strait Islander students. As at August 2021, there are 111,224 (19.3%) Queensland government school students with disability, who receive reasonable adjustments to enable them to access education.

### Queensland state schooling system

As at 2022, Queensland government schools are responsible for delivering public education services to approximately two thirds (575,285) of all Queensland school students. The Queensland Government is the largest employer of school teachers in the state, with over 54,000 teachers across the state.



The vast majority of government activity in schooling takes place at a state or territory level. Alongside the non-government schooling sector, state-territory government systems build and run schools, employ and develop teachers, enrol and meet their duty of care for students, and deliver curriculum and learning gains. In 2022-23, the Queensland Department of Education is directing more than \$8.5 billion in state funding towards government school education, supporting core education functions such as: employment of teachers and teacher aides, administrative, support and maintenance staff within schools; delivery of school, regional and system reviews to improve education delivery; and a range of central support services including governance, reporting and monitoring. The Queensland Government also provides financial support for the non-government sector, and regulates non-government schools and home education.

## External events and impacts over the term of the NSRA

The current NSRA was signed in late 2018, and spans the 2019-2023 period. This review comes in the fourth year of the agreement, with each year of the agreement having seen some form of large-scale natural disaster or global event affect Queensland schools and communities. In 2019, Queensland experienced monsoonal rains in the north followed by severe bushfires in the south of the state. In 2020 and 2021, areas throughout north, southeast and central Queensland experienced multiple severe weather events resulting in school closures, including cyclones, thunderstorms and flooding. In early 2022, over 700 school closures resulted from flooding in the south east throughout February, March and May.

Since 2020, ongoing disruptions have been experienced across Australia as a result of the COVID-19 health pandemic. The pandemic is widely recognised to have been disruptive to student learning, particularly for at-risk students and students requiring educational adjustments, for whom online learning has presented additional challenges. The pervasive and extended impact of the pandemic has also continued to affect student attendance and continuity of learning beyond 2020, with parents heeding public health advice to keep children home if feeling sick or unwell.



While the educational disruption resulting from school closures is self-evident, events such as bushfires, floods and pandemics also have a significant impact on the wellbeing of school-aged children. Our schooling system has a significant responsibility to respond to the support needs of students, and in attempting to mitigate the disproportionate impact of disruptions on already vulnerable and disadvantaged cohorts. The increasing incidence and severity of extreme weather events, which are projected to worsen as the climate changes, requires significant investment to ensure the safety of students and staff and the continuity of education. It also requires flexibility and resilience from teachers, school leaders, students and the education system as climate events continue to affect the ability of schools to perform their core business of educating and supporting students.

In the face of multiple natural disasters and a health crisis, Queensland has necessarily focused the efforts and resources of the system on the critical priority of supporting its students, teachers and schools to recover and resume learning and schooling. Notwithstanding the disruptive impacts of these events, the strength and innovation of Queensland's education system, teachers and communities have enabled Queensland to maintain academic outcomes.

## FEDERAL SCHOOL FUNDING AND POLICY ARRANGEMENTS

### Federal funding context

The arrangements around school funding are unique and complex. The NSRA itself is not a funding agreement, and contains no funding obligations for either states and territories or the Commonwealth. Recurrent funding for schools provided by states, territories and the Commonwealth is therefore not within the scope of this review. However, the *Australian Education Act 2013* (Cth) (the Act) which provides the framework for federal school funding, ties both the NPIs and the NSRA to the recurrent school funding model.

The Act sets out a number of conditions which must be satisfied in order for state-territory governments to receive recurrent funding from the Commonwealth for their government and non-government schools. In particular, states and



territories must: be party to and comply with a national agreement relating to school education reform; and implement national policy initiatives for school education that are agreed by Education Ministers, or prescribed in the *Australian Education Regulation 2013* (the Regulation).

In practice, the NPIs are set out in the NSRA and there are no NPIs in the Regulation. Despite this link between the federal school funding arrangements and NPIs, the Queensland Government does not receive any additional funding from the Commonwealth for the local costs of implementing the NPIs. Rather, the federal recurrent funding provided to Queensland under the Act is used for the ongoing operation of schools. Although this still represents a minority of the funding the Queensland Government requires to operate government schools, it is a critical input for the provision of an essential service and human right. Categorisation of an activity as an NPI therefore carries significant financial and operational consequences for Queensland.

## A principles-based approach to national collaboration

Given this context, it is critical that the purpose and intent of NPIs be clear, while accommodating flexibility and adaptability in education policy.

The Queensland Government has consistently advocated for a principles-based approach to be taken to agreeing national reforms, including NPIs. The current NPIs were not selected as a coherent package, resulting in a lost opportunity to pursue a strategic national agenda through the NSRA. Going forward, through application of principles set out below, work on the NPIs could be used to prioritise areas of action where national action is merited and where a meaningful difference could be made.

The Queensland Government's submission to the *Review to Achieve Educational Excellence in Australian Schools* affirmed Queensland's motivation to collaborate on national reforms 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.

*Principle 1: Contribute to a coherent national vision for schooling that takes advantage of future opportunities and responds to key challenges*

National action in education should be driven by an agreed national vision and the NSRA should set out a coherent strategy for achieving this vision. The absence of a strategy aligned with the vision outlined in the *Alice Springs (Mparntwe) Education Declaration* risks creating confusion, delay and duplication or unduly restricting the scope or timing of actions because of a lack of other measures of success. National action should also be able to respond to opportunities and challenges as these emerge, with room for objectives, or the plans to achieve these, to adapt and change as needed. In this context, Queensland notes the need to make room not only for emergent events and natural disasters, but other work on the national agenda beyond the NPIs. During the next agreement, we expect work will arise from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (currently expected to report in September 2023) and from the National Agreement on Closing the Gap. The NPI agenda should be able to strategically align with or make room for such work.

*Principle 2: Require national effort to stay the course and make a real and sustained difference across the system*

School education remains the jurisdictional responsibility of states and territories, with some responsibilities and levers held by the Commonwealth. State and



territory governments have for many years demonstrated a willingness and capacity to collaborate where national action is genuinely beneficial and necessary, regardless of funding agreements – two of the most significant national collaborations of recent years have been NAPLAN Online and the new Australian Curriculum, neither of which was an NPI. Given the competing demands on finite resources, it is critical that all jurisdictions recognise and agree on the value of proposed national collaborations.

*Principle 3: Are based on strong evidence from an Australian context where possible*

National reforms should have a compelling and relevant evidence base about what changes should be made, and the manner of making those changes. Such evidence should be sourced from Australian research where possible, noting that reforms enacted internationally may not be possible or desirable in Australia due to the different social, cultural, political and financial contexts. Great care should be taken before enacting reforms on the basis of their success in a context that is not replicated in Australia, or in particular states or territories.

*Principle 4: Respect existing state and territory school activities where an improvement trajectory can be demonstrated*

National work should take into account the diverse circumstances of each state and territory. Prescription of school activities at a national level without regard to existing work reduces flexibility to implement evidence-based, locally-driven solutions. National work which duplicates or contradicts existing local solutions wastes resources and has the potential to jeopardise progress state-territory governments have made.

*Principle 5: Provide for flexibility and autonomy in implementation, acknowledging the different demographic and geographic circumstances between and within jurisdictions*

State and territory governments are best placed to understand the particular needs of their schools and students. It is critical that governments and systems be provided flexibility and autonomy to adopt, adapt and implement national work to their own contexts, in order to most effectively and sustainably improve educational outcomes. This will enable priorities to be agreed at a national level,



while actions enacting that priority can be appropriate to the different contexts, positions and progress of each system and jurisdiction.

*Principle 6: Avoid encroaching on constitutional roles of states and territories as system managers, providers and majority funders of government schools*

All national collaboration on schooling should recognise the role of states and territories under the Australian Constitution to deliver education, and acknowledge that, under the principle of subsidiarity, states and territories are best placed to make decisions about schools. Prescription by another level of government that does not itself deliver schooling, provides only supplementary funding assistance within its limited role, and is not aware of local factors is not appropriate and may result in resources being directed in a way that is ineffective and/or inefficient.

*Principle 7: Minimise assessment and reporting burden on students, teachers and schools*

The existing national assessment regime is a key means of monitoring progress made across the country and one of a number of tools used to identify students' learning needs. Schools and teachers have a wealth of data available to them, and any additional assessments should be considered cautiously, and focused on their diagnostic potential. In light of the pervasive and protracted impacts of events such as COVID-19, this principle could be expanded further to capture the need for broader consideration of burden reduction, to ensure national efforts are cognisant of recovery from external shocks and the capacity of the education system as a whole.

## Current national policy initiatives

In practice, the current NPIs were not selected in a context that supported application of these principles. Negotiation of the NPIs followed significant and wide-ranging amendments to the Act in 2017 that took effect in 2018. The legislative changes were not consulted on with jurisdictions despite their impact on both funding and policy arrangements for schooling across the country, and there was limited information provided by the Australian Government about how the new legislative framework would operate in practice. As a result, jurisdictions were still spending significant time and energy seeking to understand the



legislation, and negotiating to optimise the impact of funding changes on school delivery, when the NPIs were brought forward for agreement.

The *Review to Achieve Educational Excellence in Australian Schools*, a key input for the NPIs, was released in May 2018. Under the amendments to the Act, a new NSRA, including NPIs, needed to be signed by the end of 2018, or critical federal funding would not flow to state or non-state schools in the following calendar year. Consideration of NPIs occurred in the context of this high-risk deadline, and at the same time as complex funding negotiations under the new legislative framework.

The NPIs ultimately put forward for consideration by the Commonwealth were drawn from a wide array of reports, with limited shared national understanding of the intent of NPIs or an agreed national purpose or strategic intent. The three reform directions of the NSRA constitute a broad systemic classification for the NPIs, rather than coherent strategic directions. As a result of the lack of agreed purpose, some NPIs have been re-scoped during their implementation, with confusion as to their ultimate purpose or goal.

The limited time available for consideration of the NPIs meant the selected NPIs were not fully developed, scoped or costed prior to their agreement. They were also developed without the opportunity for full engagement with key education stakeholders, with limited exploration of how they might align with broader strategies and priorities in the education sector, and with reduced opportunity to ensure NPIs met the needs of all cohorts, including equity cohorts. 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, once more information was available. This has resulted in issues for a number of NPIs, but particularly for NPIs that rely on complex, costly and high-risk IT-related or data-sharing work. This work requires substantial time and financial investment in both its development and review by jurisdictions, which was not accommodated in the milestones set in the NSRA. In some cases, work was superseded, resulting in the need for adjustments to scope and delays.

Public reporting on the NPIs, and the five-year implementation period assigned to most reforms, created a commitment to implementation of the NPIs even where



they had been superseded. While actively tracking progress against policy reforms is a critical accountability measure, the nature of the NPIs as specific, largely operational initiatives with set milestones has meant they were not adapted or reprioritised over time. As outlined above, the four years of the NSRA to date have been marked by significant disruptions resulting from COVID-19 and natural disasters, and education priorities have also changed over this period. While the Commonwealth has extended flexibility around some funding conditions as a result of COVID-19, the NSRA and NPIs have remained static and not provided for sufficient adjustments to address a changed environment. For example, the new ways of working with Aboriginal and/or Torres Strait Islander communities identified as Priority Reforms in the new National Agreement on Closing the Gap, have not been adopted into the NSRA. This was despite the call in that agreement for joint national action, and amendments to the NSRA's education-related targets to align with the National Agreement's targets.

Additionally, NPIs have repeatedly been superseded by activities being undertaken in individual jurisdictions, or have been progressed through small groups of jurisdictions. This undermines the value of collective action, and calls into question the inclusion of these initiatives as NPIs under the NSRA.

The impact of this approach to the current NPIs has been to impose a significant opportunity cost on all jurisdictions. As the current NPIs are not clearly aligned to an overarching strategic intent, or have in some cases been superseded or duplicative, effort spent on progressing this work has come at the cost of progressing other potential reforms. Given the critical importance of education as both a driver of economic growth and a social good, it is incumbent upon governments to ensure that reform efforts are targeted and clearly aligned to a national vision.

## Future national policy initiatives

Queensland remains committed to a principles-based approach to any new NPIs. All future national collaboration should be assessed against clear principles, such as those set out above. Similar principles may also be derived from key intergovernmental statements, including the Council on Federal Funding Relations' *Federation Funding Agreements Principles*, and the Education



Ministers' endorsed narrative on *National Initiatives to Support Teaching and School Leadership*. A principle relating to the process for designing NPIs, with appropriate regard given to the reform priorities in the National Agreement on Closing the Gap, should also be closely considered.

The opportunity presented by the NPIs to align with a clear, coherent national vision for education may be lost if a principled and strategic approach is not taken. The Queensland Government is aware of the already significant stakeholder interest in a future NSRA, noting a number of recent reports and agreements have sought to influence its content. In addition to the Australian National Audit Office (ANAO) *Monitoring the Impact of Government School Funding – Follow-up* report, these include recommendations or actions in the:

- National Mental Health and Suicide Prevention Agreement;
- *Final Report – 2020 Review of the Disability Standards for Education* 2005;
- *Next Steps: Report of the Quality Initial Teacher Education Review*; and
- *Don't take it as read: Inquiry into adult literacy and its importance* by the Standing Committee on Employment, Education and Training.

Future NPIs must be strategic and deliberate, adding value to schools' core business of educating and supporting students in safe, secure environments. National work that emphasises flexibility will be particularly important, to ensure disruptions due to external events, emergent national priorities, and jurisdictional and system-specific activity can be accommodated.

A principled approach may also be applied to determine the best way forward for those NPIs that remain incomplete within the current term of the NSRA. The status of unresolved NPIs should be assessed before new initiatives are added to the national agenda.

## NATIONAL MEASUREMENT FRAMEWORK

### Purpose of assessing the appropriateness of the Measurement Framework

The Commission has been asked to assess the appropriateness of the *Measurement Framework for Schooling in Australia* (Measurement Framework)



in measuring progress towards the outcomes of the NSRA. The intent of this aspect of the review is to identify whether the Measurement Framework, as currently approved, measures the impact of the NSRA.

Noting that this review is intended to inform the design of the next national schooling agreement, it is expected that recommendations may focus on measures for use in the next schooling agreement. This submission therefore seeks to clarify the relationship between the Measurement Framework and the NSRA, before proposing improvements to the methods used to assess the impact of the NPIs, based on the principles already outlined above.

In considering outcomes and measures, the Commission should have due regard to the NSRA's status as a National Agreement, with significant policy content and complex and bespoke terms, but no funding content. As previously outlined, funding provided as a condition of signing the NSRA is instead provided under legislation. Unlike Federal Funding Agreements, which may link attainment of agreement-specific outcomes or targets to funding, National Agreements do not draw such a link.

## Development of the Measurement Framework

The Measurement Framework has a history and purpose that is independent of the NSRA. Originally developed in 2010, the Measurement Framework sets out the nationally agreed key performance measures (KPMs) for schooling, against which all states and territories publicly report annually via the *National Report on Schooling in Australia*. Education Ministers delegated responsibility for the Measurement Framework to the Australian Curriculum, Assessment and Reporting Authority (ACARA), which conducts cyclical reviews for Ministerial approval. The Measurement Framework's KPMs are guided by principles, including that the measures are strategic and provide nationally comparable data on performance critical to monitoring progress and achieving the goals set out in the Mparntwe Declaration.

The KPMs were not designed or intended to monitor progress on achievement of the goals set out in the NSRA, and the purpose of the Measurement Framework is longer-term and broader than the measurement of outcomes of the NSRA. The Measurement Framework is best understood as aligned to and supporting the



Mparntwe Declaration, which represents Australia's vision statement for education policy. It provides for health checks of Australia's schooling system by focusing on agreed high-level, long-term metrics that provide insights into changes across the system over time. Together, the Mparntwe Declaration and the Measurement Framework provide an enduring, long-term vision for Australian schooling.

## Outcomes measures in the NSRA

The 'outcomes' measures for the NSRA are set out at paragraph 37 of the agreement, and link to specific 'sub-outcomes' that are largely, but not entirely, aligned with the Measurement Framework. There is no direct relationship between the outcomes or sub-outcomes and the NPIs or any other activity under the NSRA. Noting that, as outlined above, the NPIs represent a minority of the activity undertaken by jurisdictions, are short-term based on the term of the NSRA, and are limited to the schooling space, any measurable impact resulting from the NPIs is not likely to be realised for a number of years. Changes reflected in the measures set out in the Measurement Framework will be difficult to attribute to the NPIs amongst the myriad of reforms and other factors that influence student outcomes. This both contributes to, and stems from, the lack of an agreed strategic approach in the NSRA.

## NSRA outcomes

We therefore refer the Commission to the principles already outlined above, and encourage consideration of how these may be applied in the context of appropriate evaluation and/or outcomes measures for the NPIs or the NSRA as a whole.

For example, national agreement to key, strategically aligned measures of progress against reform directions could make clear what underpinning any NPIs are aiming to achieve. This could ensure that flexible implementation approaches, which take account of individual jurisdictional contexts, continue to progress with the same ultimate goal.

The need for a new, and national, approach to particular measures should consider any other mechanisms for measuring outcomes already in place in other



sectors, have value as an accountability measure, or be able to be influenced through national activity and thereby provide evidence for continuous national improvement. A strong evidence base underpinning the approach to evaluating outcomes from the NSRA would also be beneficial. In particular, evaluation approaches or measures should be rigorous, appropriate to the scope of the NPIs, and should follow a program logic approach. As previously suggested, it is unlikely that changes in performance measured by the Measurement Framework could be attributed to the NPIs – the NPIs are at varying stages of maturity, are a minority of the activity undertaken in the education space by states and territories, and can only affect some of the inputs that affect children's education outcomes. As a system-wide health check, the Measurement Framework was not developed with the intent of being able to evaluate such initiatives. More appropriate, evidence-informed methods for checking whether reform directions or particular activities have been successful would provide better guidance about how to progress an initiative.

Finally, we note that the development of new measures, particularly where these are required to be nationally consistent, may create an administrative and assessment burden for schools or systems. This impact needs to be carefully balanced against the value of a particular measure for schools (for example, as a diagnostic tool where schools are capable of influencing improvement), the necessity of national consistency or harmonisation, the existence of similar measures already in place, and the use and governance of the data to be collected.

## CONCLUSION

The NPIs are a significant opportunity to undertake meaningful national collaboration and create change across the Australian education system. However, in order to seize this opportunity a new approach to the development and implementation of future any NPIs must be agreed. This approach should be based on principles like those outlined in this submission and designed to ensure national effort is dedicated to creating sustainable change. The outcomes of such NPIs should be evaluated by mechanisms that are, similarly, carefully and specifically designed for this purpose.



Queensland looks forward to further engagement with the Commission throughout this review, and to considering the Commission's recommendations on the NPIs, the Measurement Framework, and the next national school agreement.