

SUBMISSION COVER SHEET



Independent Education Union of Australia

**Review of the National School Reform Agreement
Call for Submissions Paper
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Organisation: **INDEPENDENT EDUCATION UNION OF AUSTRALIA**

Principal contact: **Christine Cooper**
Position: **Acting Federal Secretary**

Street address: **Unit 11 & 12**
3 – 5 Phipps Close
DEAKIN ACT 2600

Postal address: **PO Box 177**
Suburb/City: **Deakin West ACT 2600**

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Introduction

1. The Independent Education Union of Australia (IEUA) thanks the Productivity Commission for the opportunity to provide feedback in relation to its review of the National School Reform Agreement (NSRA) Interim Report.
2. As a union of 75 000 teachers and support staff in non-government education institutions throughout Australia, our union is acutely aware that, for decades, Australia's educational systems and processes have been plagued by a proliferation of policies, programs and tasks that are not adequately staffed and resourced, consequently detracting from teachers' core teaching and learning activities.
3. We refer the Productivity Commission to the previous paper submitted by the IEUA on the Review of the National School Reform Agreement (17 June 2022)

Information Request 2.1

What steps could governments take to realise the full potential of evidence-based research through the AERO?

4. AERO has a significant role to play in validating the education basis of initiatives proposed by schools or employers. However, of perhaps even greater importance, AERO is in the position to provide authoritative advice on best practice implementation of educational initiatives, including considerations around the essential consultation with and onboarding of teachers, the necessity of appropriate timing of implementation, in-built review processes and cautionary guidelines around implementation of multiple initiatives at the same time.
5. The IEU questions the claim that in 2021 AERO found that up to 71% of teachers reported using teaching strategies that are generally not shown to be effective for student learning in most or every lesson. The IEU seeks an explanation of this statement and the basis on which it was made. It is our firm belief that the vast majority of teachers are implementing strategies as directed by their school or system consultants. The relentless churn of initiatives suggests that the initial evidence base for such changes was or is insufficient.
6. The IEU agrees with AERO's observation that "we are not effectively utilising our best teachers..." and that "our existing teacher career paths do not systematically build, recognise and deploy teaching expertise."
 - a. The IEU proposes two possible career pathways. The first, allowing teachers to choose to be highly accredited as fulltime classroom practitioners where their skills are appropriately recognised and remunerated. Alternatively, a career path that embraces instructional leadership which includes satisfactory time release in order to undertake responsibilities related to mentoring or leadership of school-based initiatives.
 - b. The rationale for these two proposed career pathways is that the HALT accreditation process has traditionally carried the expectations of schools and employers that teachers achieving accreditation at the Highly Accomplished level would automatically assume duties and responsibilities previously allocated to members of the leadership team/ Lead teachers without any attendant release or appropriate remuneration.
7. The IEU is broadly supportive of the aims of the Online Formative Assessment Initiative, provided there is a commitment to preserve and protect teacher

autonomy when determining its use for their students. This autonomy extends to the assurances of an opt-in model of professional development, maintaining the teacher's right to assess their professional development needs.

[Information Request 2.2](#)

[Options for enhancing accountability](#)

8. Where accountabilities intersect with equity of access, they should be transparent and specific.
9. The IEUA asserts that the following indicators should be included in the Measurement Framework to provide a more reliable and complete picture of the key drivers of student outcomes across the three key NSRA domains – academic achievement, engagement and skill acquisition:
 - a. Staffing measures
 - i. Every student is taught by a teacher who is qualified for the relevant age, stage, or course content, including, where necessary, specialist teachers
 - ii. Every school achieves 100% of its current staffing requirements, both teaching and support staff
 - iii. Every school has access to suitable allied health professionals to meet the current needs of the student cohort
 - b. Physical school environment
 - i. Every school has appropriate permanent learning spaces to accommodate their current student cohort.
 - ii. Every school has a fully funded 5-year plan for capital works, maintenance and replacement
10. For this reason, a core goal of successive NSRAs should be to review what is measured and how this aligns with broader social and economic evolution.
11. Effective input into policy formation can only be achieved through consultation. Policies must be developed that guarantee genuine consultation and effective input into policies and proposed initiatives prior to any implementation and include provision for ongoing review. Jurisdictional and employer policies must ensure that genuine consultation extends to individual schools and staff and education unions to ensure effective input into policy formation. Where schools, staff and education unions are not consulted, the disconnect between policy making and implementation in the classroom widens and policies fail to achieve their aims.

[Information request 3.1](#)

[Intensive targeted support for students who have fallen behind](#)

12. Inequities in the education system are the main drivers of inequitable outcomes.
13. Targeted programs that address these inequities as identified by the IEUA in Information Request 2.2 (9) should be included in the next intergovernmental agreement on schools.

Information request 3.2

Priority equity cohorts for the next agreement

14. As identified by the IEUA in Information request 2.2, access to allied health services and sufficient in-class support for all students is essential to address inequitable outcomes.
15. Moving schools has been recognised as having a significant effect size on limiting or negatively impacting student outcomes. Transitory students who change schools for whatever reason (eg children of military personnel) should be considered as a priority equity cohort in the next agreement.
16. The structural shortcomings within the system of initial teacher education must be addressed. It is necessary to create an environment that allows successful development of the skills of early career teachers. Essential to this environment is access to mentoring support from classroom teachers – access which is currently imbedded due to excessive workload of teachers. It is imperative that workload issues are addressed to as a priority to ensure quality access
17. Without adequate support for ITE graduates, complaints about the failure of early career teachers to address the needs of students with disability or indigenous backgrounds is simply an exercise in teacher-bashing.

Information request 3.3

Implementation plans

18. Accountability mechanisms, while desirable for transparency, must not translate into increased paperwork and documentation for teachers. Current national and state efforts to find appropriate solutions to the teacher shortage crisis, in large part driven by the teacher workload calamity, must not be undermined. Genuine engagement with the profession - teaching staff and education unions - must be part of a transparent consultation process prior and during to the implementation of any proposed accountability mechanisms.
19. Aligning or linking enhanced accountability mechanisms, particularly where they strengthen the link between new accountability mechanisms and ongoing national priorities such as Closing the Gap and Australia's Disability Strategy, should improve effectiveness, provided appropriate consultation on any impacts on teacher workload have been considered and addressed.

Information request 3.4

Transparency of funding for students from priority equity cohorts

20. Transparency of schools funding and expenditure data must be further enhanced to ensure a guarantee of appropriate governance and accountability that funding allocated goes directly to student and staffing needs. In many cases, it is currently unclear what level of funded support is accessible to students and staff.
21. For some students, such as First Nations students and those from rural and remote areas or disadvantaged urban communities, there are fundamental challenges in accessing quality education. These have been well-documented by a series of government and non-government investigations, reviews and reports.

Information request 3.5

Embedding the perspectives of priority equity cohorts in national education policy and institutions.

22. The indigenous community has engaged in a lengthy process of consultation and developed a plan that describes avenues for embedding their view and providing advice to government. This should be implemented without delay. In terms of how it should be established, the indigenous community should define the structure.

Information request 4.1

Should there be National Policy Initiatives to improve student wellbeing?

23. All jurisdictions are impacted by the effects of post-pandemic burnout and will need to allocate varying degrees of local resources to address student and teacher wellbeing. Consultation with schools, staff and education unions is essential to the success of any initiatives implemented.
24. The workload impact on teacher wellbeing directly affects student wellbeing, since it limits the capacity of teachers to provide support to students.
25. The training on recognising trauma and responding to wellbeing concerns may vary between ITE providers.
26. Publicly funded programs such as the federally-funded chaplaincy program should be reallocated to increase the access to allied health professionals and services in schools.

Information Request 5.1

Teaching Performance Assessment

27. The TPA process has undergone significant recent review in NSW, but IEU consultations with the NSW Council of Deans and other Initial Teacher Education stakeholders indicate ongoing concerns related to the relative strength of training in academic subjects when compared to training in “teacher disposition” (for example supervision responsibilities, conducting parent teacher interviews etc). Enhancing the professional experience component of initial teacher training by strengthening the links between universities and schools is a desirable but difficult objective. Difficulties in sourcing sufficient teacher mentors and supervisors are easy to comprehend when viewed against the backdrop of the demoralisation of the profession and chronic teacher shortages and overburdening workloads.
28. Addressing teacher performance issues, including the Teacher Performance Assessment, obfuscates the pressing issues of recruitment and retention related to uncompetitive salaries and unsustainable workloads which face the whole profession, including new graduates and early career teachers. It is imperative for jurisdictions and schools, in consultation with staff and education unions, develop policies and initiatives that address the issues of uncompetitive salaries, and unsustainable workloads prior to considering teacher performance assessments.
29. National minimum standards in initial teacher education should be broader than the Australian Professional Standards for Teachers.

30. In addition to academic and pedagogic training, a suite of non-academic, professional behaviours required for successful, quality teaching and learning practice must be an integral part of initial teacher education programs, on the basis that the requisite skills (e.g. boundary setting, maintenance of professional relationships, conflict resolution, crisis management, relational skills, discretion etc) are not innate, but rather learned skills that can and should be developed as part of a quality ITE program and ongoing professional learning. The full suite of professional skills required for quality practice may be best cultivated and refined through immersion in professional experience, but this should not be used as an argument for demanding more of school-based, supervising/mentoring teachers without appropriate industrial and professional recognition of their role which addresses workload and professional salary issues .

[Information request 5.2](#)

[Induction and mentoring programs](#)

31. In the non-government sector, access to induction and mentoring programs are negotiated with employer bodies. The IEU is firmly of the view that the current arrangements offer inadequate support, as validated by the high rate of attrition in early career teachers, or the completion failure of Initial Teacher Education students after their practicum/ professional experience periods.
32. The wrap-around support structures that are provided in federally funded programs such as Teach For Australia should be considered the minimum standard provided to all interns and early career teachers across all jurisdictions. A federally funded national teacher mentoring program would go a long way to bringing this to fruition.

[Information request 5.3](#)

[The prevalence of teacher attrition](#)

33. A comparison between attrition rates in other professions is unhelpful. The attrition rate in the teaching profession has resulted in a national teacher shortage and a crisis in education.
34. Government policy could address high teacher attrition by supporting:
- a. significant pay increases for teachers
 - b. the requirement that government agencies and jurisdictions commit to a review of teacher workload. Employers, regulatory authorities and government agencies in consultation with education unions, must be required to develop a teacher workload impact assessment of all current and proposed initiatives, by examining their own documentation practices and requirements to identify areas of overlap, duplication or redundancy that could be eliminated.
35. The drivers of teacher attrition vary across the course of a teacher's career. The current teacher shortage is the combination of a crisis of recruitment and a crisis of retention.
36. The data on teacher attrition would be well known to the Productivity Commission.

- a. High school students are not selecting teaching as a career in sufficient numbers. While initial teacher pay compares favourably with other professions, the salary plateaus quickly and senior teachers are not well paid in comparison n. The community is aware of this fact, so high school students are aware of this fact.
- b. The community have also become increasingly aware of the reality of teacher workload, perhaps as a result of remote learning during the pandemic. High school students and potential teaching candidates are also aware of the heavy workload and low pay nexus.
- c. The drivers of attrition for early career teachers mirror the causes identified by mid and later career teachers, including unsustainable workloads. However, this group also face the challenges of the potential of increased casualisation of employment and more appealing employment opportunities outside of the profession. It's often easier for people to make career jumps early in their working life. As identified in the IEUA response to Information request 5.1, explicitly addressing the skills of professional disposition in initial teacher training may help to address this aspect of attrition.
- d. The ATWD data indicates that a significant proportion of mid-career and experienced teachers are planning to leave the profession. In addition to the uncompetitive salaries, which provide inadequate remuneration for the responsibilities and the workload teachers carry, 87% of teachers who responded to the ATWD survey and indicated their intention to leave cited workload as the primary issue.
- e. The increasing complexity of the workload and the changes in technology present additional challenges to teachers approaching the end of their careers. The consequent loss of experience to the profession is enormous. Utilising the experience of end of career teachers through a program that engages them as mentors would provide invaluable support for their teaching colleagues who are at an earlier stage of their careers.

Information request 5.4

Teaching assistants and support staff

37. The primary functions of teaching assistants and support staff would vary across Australia. However, as a general comment, the IEU believes that the support staff workforce are highly skilled and may be under-utilised, particularly in primary schools.
38. Information request 5.4 pre-supposes that support staff have excess capacity within their current working hours. Apart from high end financial administrators, most support staff are paid on an hourly basis.
39. Re-allocation of low value tasks from teachers to support staff would typically require an increase in support staff hours. Any additional allocation of duties would come with an additional cost.
40. National collaboration on deployment and use of teaching assistants may unduly delay any implementation of change in this area. Local and state initiatives may be likely to result in more timely improvements.

[Information request 5.5](#)

[Streamlining pathways into teaching](#)

41. When looking at mid-career pathways into teaching, we need to identify the problem being addressed. If the issue is recruitment and retention, employing mid-career entrants would only be addressing the tip of the iceberg.
42. Employment-based pathways also capture third and fourth year initial teacher education students, increasingly so given the current staffing crisis. The IEU believes that enhanced support structures and ongoing longitudinal tracking of teachers entering the profession in this manner is essential to identify and address any future unintended consequences (including increased rates of attrition or teacher burnout).

[Information request 5.6](#)

[Understanding what happens in the classroom](#)

43. Teaching is a highly-scrutinised profession and the degree of accountability of individuals is extremely high. Collaboration between teachers, team teaching, student work samples, assessment data and Principal visits are just a small sample of the ample opportunities to understand what is taught in classrooms.
44. The perceived decline in educational outcomes is not related to teacher quality. Increasing scrutiny of classroom practice casts aspersions on the profession. If data is needed on classroom practice, direct enquiry to teachers is the most timely and cost-efficient way to obtain the information. The scope and sequence, program, and assessment documentation is sufficient evidence of classroom practice for any education professional making an enquiry. The intention to increase scrutiny in the classroom is a deflection from addressing factors such as relentless compliance expectations, unchecked interruptions to teacher time and insufficient support for an ever-increasing number of students with special needs in mainstream classrooms.

[Information request 6.1](#)

[Fostering school leaders](#)

45. The IEU represents principals in the non-government sectors. These principals report a lack of resources, support and professional development opportunities. Given the demands of the role and the excessive compliance requirements, suitable candidates are increasingly reluctant to apply for leadership roles.
46. In line with the views of the regulatory authorities in some states, (for example, the New South Wales Education Standards Authority (NESA) in NSW) the IEU contends that principals making educational leadership and professional registration decisions for their schools and staff must be accredited teachers.

Information Request 7.1

Standalone reporting against the National Reform Agreement.

47. Broadly speaking, the IEU is supportive of this proposal. It is essential, however, that publicly-available information is not weaponised, with schools in the firing line.