

SUBMISSION COVER SHEET



Independent Education Union of Australia

**Review of the National School Reform Agreement
Call for Submissions Paper
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A 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).

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 While we do not challenge the premise that education systems must support students' development of core literacy and numeracy skills and prepare graduates to participate meaningfully in further education and work, progressive, strategic reform is long overdue. Without reform, the goal of providing high-quality, equitable education for all students will never be achieved.

4 Both the NSRA [1] and the Mparntwe Declaration [2] make commitments to improved equity and access to high-quality education, but none of the existing National Policy Initiatives do anything to address social, economic, and educational factors that give rise to, and perpetuate, inequity in the first instance.

5 Enacting high-quality, high-equity education is impossible if we assume that equity targeted groups, and future generations, value the same things that have been privileged throughout human history to date.

6 Social movements such as #metoo, climate activism, the Black Lives Matter movement and growing concerns about aged care and mental health crises are examples that contemporary, global society is shifting toward a broader value system than that currently recognised and rewarded within the mainstream economy.

7 Australia now has an opportunity to support schools through a transition to a more sustainable model of operation where they are less dependent on existing school staff, and community volunteers, taking on unrecognised and unrewarded work that proliferates at a pace that is inconsistent with quality outcomes.

8 The IEU would argue that there is an urgent need to reconsider the functional impact of '*unrecognised*' work that goes on in schools and to correct a situation where too many schools are inadequately staffed and resourced, too many teachers are overloaded with administrative burdens and support staff, and access to allied health services, are not seen as essential to the provision of high-quality, high-equity education.

9 Being prepared and equipped to fund and resource schools in ways that are consistent with contemporary roles and purposes of education, will, quite naturally, converge on a more just and inclusive society that manages natural resources in a sustainable way.

10 In responding to the Information Requests, we make a number of suggestions as to how revision of the National Measurement Framework, and the development of new National Policy Initiatives that are aligned with contemporary aspirations for our education system will support improved educational, and ultimately societal, outcomes for students from all backgrounds.

B Response to Information Requests

Information request 1: Drivers of student outcomes

What does the evidence suggest are the key drivers of student outcomes across the three key NSRA domains – academic achievement, engagement and skill acquisition.

- a) Are there barriers that disproportionately impact outcomes for specific cohorts of students?
- b) Which of these drivers or barriers can governments change or influence?
- c) Have these drivers changed over the past decade or over the life of the NSRA?
- d) Looking forward, are there changes in the external environment or policy context that will affect these drivers?

11 It is undeniable that there are barriers that disproportionately impact outcomes for specific cohorts of students, including inadequate staffing and physical classroom environments, overloading teachers with administrative burdens and underuse of support staff and allied health services.

12 The IEU believes that the key drivers of student outcomes across the three key NSRA domains of academic achievement, engagement and skill acquisition that governments can change or influence are;

- *adequate teacher staffing,*
- *physical classroom environment and resourcing,*
- *preservation of professional time for teaching and learning, and*
- *best-practice use of support staff and allied health services.*

Adequate teacher staffing

13 For some students, such as those from rural and remote areas or disadvantaged urban communities, and First Nations students, 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. (e.g. [3-11])

14 Decades of inadequate development of Australia's regions means rural and remote schools face significant challenges in attracting and retaining qualified and experienced teachers. Public rhetoric that creates negative perceptions of the profession compounds the problem.

15 Unfilled teacher vacancies and casual teacher shortages are prevalent across the states. In addition, and out of necessity, the occurrence of teachers teaching out of their subject area is widespread. The IEU believes that these issues should be addressed by government as a matter of urgency.

16 The current workforce shortages and the rate of staff turnover has a significantly damaging impact on student-teacher relationships impacting on student wellbeing. Students thrive on consistency in student-teacher relationship and the current exodus of teaching staff from the workforce threatens this. In considering this as a significant barrier to outcomes, the teacher-student relationship connection must be considered in its entirety. Student wellbeing can not be considered in the absence of consideration of teacher wellbeing.

Physical classroom environments and resourcing

17 Investment in technologies that enhance connectivity between urban and remote environments, for example, can provide better access to educational programs and resources for students, and support teachers to feel less isolated when practising in remote communities. (Although it should be noted that remote and online learning also has inherent risks [20] which require careful management).

Preservation of professional time for teaching and learning

18 Without significant systemic support, teachers are also left to deal with challenges that extend far beyond the design and delivery of instructional programs.

19 The most recent report of the Australian Teacher Workforce Data project [13] indicates that teachers work, on average, 140-150% of their paid hours and that the largest proportion of non-face-to-face teaching time was spent on preparation and assessment tasks. This is clear evidence that teachers' core workload is unsustainable, even before additional administrative, record-keeping and student support tasks are taken into consideration.

20 The IEU is concerned about the impact of ongoing workforce shortages on teacher's ability to address adequately address the many layers of change and review that impacts their work. The relentless cycle of compliance and initiative churn driven by Federal and State Government, education system and school level culminate in many 'priorities' being juggled at once. Most require additional time or resourcing which is not provided which impacts both the success of implementation but also the wellbeing of staff involved, resulting in significant levels of burnout and high stress. Period of significant staff shortage impact teacher's ability to find the time and intellectual capital to work through updates to curriculum study designs or the details of a new compliance or initiative requirement which will negatively impact the outcomes, despite the best efforts of those involved. We urge the Productivity Commission to assist with finding improved focus and ways to streamline these processes.

21 The IEU calls upon regulatory authorities to streamline compliance requirements that impact teacher responsibilities in programming and data collection, as recommended by the NSW Curriculum Review: *Nurturing Wonder and Igniting Passion: Designs for a new school curriculum* (2020) the Gallop Report *Valuing the Teaching Profession—An Independent Inquiry* 2022 and the Grattan Institute Report *Making Time for Great Teaching* 2022. Employers should observe the streamlined requirements. [12-19]

22 Further, the IEU strongly believes that providing teachers with sufficient release time to prepare differentiated lessons and resources is essential to ensure full and equal access to the curriculum.

23 The IEU recognises that members of school leadership teams are also victims of relentless compliance and initiative churn, resulting in significant levels of burnout. School or system expectations on these teachers and principals should be accompanied by appropriate support, including a proper assessment of the need and purpose of various initiatives, and the provision of adequate release time.

24 The IEU recognises the significant challenges on school leaders, especially Principal in the current environment. We are concerned about inconsistency in the preparation and support given and the lack of a strategic approach to capacity building for individuals and leadership teams that enable them to be effect as leaders and change agents with education. While initial induction processes for new leaders have improved there is still a significant shortfall in professional development and support in an ongoing and planned way. This is especially the case in relation to the complex elements such as budget, human resource management and change management. Too often it is left to the individual leader to recognise and seek out their own development opportunities resulting in ad hoc and inconsistent experiences and results. Given the vital role of leadership within schools we urge a greater focus on addressing this area of concern.

25 An additional complexity is that some employers have moved to a model of school leadership that encourages school leaders to remove themselves from direct engagement with their colleague teachers and instead focus on the generation of more layers of paperwork. These additional layers adversely affect teaching and learning outcomes, since they contribute to the relentless increase in compliance and documentation requirements and are destructive in terms of teacher preparation time.

Best practice use of support staff and allied health services

- 26 Teachers' knowledge and skills, and the essential nature of their work are grossly underestimated, under-utilised, and consequently undervalued, by a system that fails to recognise a stark need for increased investment in wraparound services, delivered by specialist support staff.
- 27 This includes education support staff, who provide teachers and students with essential classroom support, but should also extend to health professionals (e.g. psychologists, speech therapists) where there is an identified student need.
- 28 The IEU recommends a key policy initiative should be a redesign of the education system to:
- a. Utilise the untapped skills and qualifications of existing education support staff and classifying and remunerating them appropriately.
 - b. Create in-school positions or facilitating easy access to allied health professionals (e.g. psychologists, speech therapists, occupational therapists) to deliver wraparound services to at-risk and vulnerable students.
- 29 Without this support, the work of supporting at-risk and vulnerable students is unfairly, and inappropriately, shifted to teachers and education support staff, which undermines the pursuit of meaningful educational outcomes.
- 30 The IEU believes that creating the conditions and supports that students and their communities need to meaningfully engage with education is not just ideologically sound, it is a prerequisite for a high-quality, high-equity education system.
- 31 The IEU would optimistically indicate that effectively all drivers of student outcomes can be addressed with careful, broad-thinking policy initiatives.

Information Request 2: Assessing the appropriateness of the National Policy Initiatives

- a) **The NSRA (s.43) provides some guidance on the nature of national initiatives. Are there other principles that should be applied when identifying NPIs suitable for inclusion in a national agreement? What should these be?**
 - b) **What policy areas are best suited to national collaboration and why? Of those, which are best pursued through the NSRA?**
 - c) **Are there ways to maximise the benefits of national collaboration?**
 - d) **Are the three reform directions — supporting students, student learning and student achievement; supporting teaching, school leadership and school improvement; and enhancing the national evidence base — still the best statement of priorities for reforming schools?**
 - e) **Do the NPIs align well with the reform directions and are they the best opportunities for collaborative reform?**
 - f) **Is there any unfinished business associated with implementing the NPIs that would justify including additional actions in the next national school reform agreement?**
 - g) **Are there other initiatives that would better address key needs or government priorities for schooling?**
 - h) **What policy initiatives (or actions) would be appropriate to include in the next national school reform agreement? Why?**
- 32 While the IEU does not have a philosophical objection to any of the existing NPIs – notwithstanding the lack of progress in most cases – we do not believe these are sufficient to address the more substantial problems which prevent the actualisation of high-quality, high-equity education, namely adequate teacher staffing and classroom resourcing, preservation of professional teacher time and the underuse of support staff and allied health services.
- 33 The actualisation of the NPIs should be viewed as a foundation for further work rather than an end point.
- 34 The IEU believes that any further policy initiatives which might be developed, should have a clear goal of increasing quality and equity within the system more broadly.

35 Further, the IEU believes that while the existing NPIs have established a basis for measurement of student achievement in a limited number of areas, the broader goals of supporting students and their learning, supporting teachers and school leaders remain largely unaddressed.

Information request 3: Assessing the effectiveness of the National Policy Initiatives

- a) **Is there evidence that the NPIs have achieved expected short- or medium-term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?**
- b) **Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?**
- c) **Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?**
- d) **Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?**

36 While there is clearly some merit in each of the various NPIs, none are likely to produce the transformational changes required to reconfigure our education system to deliver high-quality, high-equity outcomes in the absence of adequate staffing measures and classroom environments, reduction of administrative and utilisation of support staff and allied health services.

37 The initiatives to review teacher workforce needs and strengthen the initial teacher education system for example have, to date, disregarded practical and industrial solutions put forward by education unions and other professional organisations. As such, the IEU continues to call for meaningful consultation between Governments and education unions regarding the industrial needs and impacts of teacher workforce needs.

38 The IEU calls for the establishment of a national benchmark for wraparound support structures (time release, dedicated mentors and supervisors etc) to ensure the initial teacher experience and early career teachers up until achieving proficient teacher status are appropriately inducted into the profession.

39 The IEU further believes that, utilising the specialist skills of support staff, including employing First Nations Language and Culture Educators in schools would assign value and confer respect on language and culture skills and knowledge, creating career options for First Nations people.

40 The IEU further highlights that there is a need to foster professional and paraprofessional employment opportunities in rural and remote schools, with a view to drawing on residents from local communities.

41 It is past time for adopting a more progressive, inclusive approach which creates social and economic opportunities that can be accessed by, and are inherently attractive to, students from equity cohorts.

42 For further commentary regarding the implementation of existing NPI, refer to Schedule 1

Information request 4: Measurement Framework and performance indicators

- a) **Does the performance reporting framework in the National School Reform Agreement (NSRA) embody the 'right' mix of objectives, outcomes, targets and sub-outcomes for inclusion in a future agreement?**
- b) **Do the objectives, outcomes, targets and sub-outcomes in the NSRA align with the aspirations set out in other key documents such as the Alice Springs (Mparntwe) Education Declaration?**
- c) **Does the Measurement Framework for Schooling in Australia provide a relevant, reliable and complete picture of progress towards achieving the outcomes of the NSRA?**
- d) **Are there performance indicators not included in the Measurement Framework that would help provide a more relevant, reliable and complete picture of student outcomes, both as identified within the NSRA and more broadly?**

- e) **Are there impediments to governments adopting these indicators (for example, data availability, cost)?**
- f) **What are some current or planned national data projects that might be relevant to measuring progress against the outcomes of the NSRA?**

43 The IEU acknowledges that the existing National School Reform Agreement has had utility in establishing some foundation for future agreements, but there is an urgent need to broaden goals and outcomes.

44 This broadening must focus on defining, and setting meaningful targets, related to:

- The types and forms of unrecognised and unrewarded work that takes place in schools;
- The types and forms of learning that are valued by contemporary society, and in particular, equity groups and;
- How these types and forms of work and learning might be resourced and supported in order to transition to new social and economic paradigms.

45 The IEU strongly supports the Mparntwe Declaration. It is appropriate that the vision for Australia's education systems and their outputs is broad and aspirational. However, the IEU believes, that the current NSRA and its existing metrics for success are not sufficient indicators of quality outcomes because they focus on narrow conceptualisations of education and its cultural, economic and social purposes.

46 For example, performance on NAPLAN and PISA tests represents just one form of learning and, while it is appropriate to increase numbers of students from equity-targeted groups that attain literacy and numeracy benchmarks, this is not sufficient to ensure that those students will successfully transition to meaningful social and economic participation.

47 The IEU 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:

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

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

48 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

C Concluding comments

49 Australia, like many post-industrial economies, is dealing with a crisis brought about by a growing disconnection between education systems and other elements of society and the economy.

50 More than ever, education is fundamental to transformation of society, and must be reconfigured to enable:

a) social transformation in the form of a movement to greater equity and less discrimination and exclusion;

b) economic transformation in the form of increasing the value of undervalued work (e.g. childcare, disability support, aged care) and the establishment of new industries (i.e. the transition from a fossil fuel economy) and;

c) environmental transformation in the form of climate change mitigation and better ongoing management of natural resources.

51 It is appropriate, at this point, for government to collaborate with those who work within the education system to identify the nature and extent of unvalued, and undervalued, work that takes place and develop clear strategies to staff and resource this work at an appropriate level. Education Unions must hold a significant role in such collaboration and consultation.

52 When considering staffing and resourcing options, it is crucial to remember that, while there will always a place for fundamental literacy and numeracy skills and rigorous, intellectual inquiry, the world we now live in demands a more wholistic, inclusive education system that provides all students with access to high-quality, high-equity education.

53 The IEU urges the Productivity Commission to be bold and progressive in its review of the NSRA and to make recommendations that recognise education as an ever more complex undertaking that demands dynamic and flexible conceptualisations of teaching and learning, delivered in conjunction with societal and industrial supports like affordable, accessible, quality child care, meaningful parental leave provisions and social and economic conditions that are conducive to mental, physical and environmental good health.

54 While an initial investment in increased staffing and resourcing for schools will be costly, this is the only way to counter the longer-term costs of failing to reconfigure an education system that is no longer fit for purpose.

55 To do nothing will result in further amplification of hidden costs (such as teacher attrition and student disengagement).

56 Unless they are allowed for in a formal economy that recognises the full spectrum of work done in schools, the hidden costs of ‘education production’ will push the system to crisis.

57 There is some evidence (e.g. widening social and economic inequity, teacher attrition) that the crisis point has already been reached.

58 As indicated in our responses to the Information Requests, the existing NPIs, and associated data projects, will retain a fundamental utility within a reconfigured education system, but are not sufficient to ensure that all students have access to high-quality, high-equity education.

59 This can only be achieved by a complementary set of new initiatives that address issues of inadequate staffing and resourcing, which is evident in the overloading of teachers with administrative tasks, while the skills, knowledge and experience of support staff and allied health services are underutilised.

60 On a final point, the IEU would urge the Productivity Commission to promote the dedication and professionalism of teachers and counteract negative perceptions circulated by the media and others. Over the last couple of decades, the factors impacting academic achievement, engagement and skill acquisition have been largely outside the control of teachers. And yet, as we have seen over and over again, the popular remedies have been to unfairly criticise the profession, further erode teacher

agency in the classroom by locking teachers into initiatives that don't meet the needs of their students, and overload them with duplicative and unnecessary paperwork.

61 We urge the Productivity Commission to avoid this trap, which compounds teacher recruitment and retention issues and perpetuates a vicious cycle. The negative impacts on academic achievement, engagement and skill acquisition have been created by serious deficiencies in the quality or implementation of initiatives and widespread equity issues.

62 Therein lie the solutions.

Schedule One

Summary Commentary regarding existing National Policy Initiatives

The IEU believes it is essential to note the following comments in response to the implementation of the existing National Policy Initiatives;

- The impact of change needs to be managed across sectors/systems
- The communication of outcomes needs to be clearer
- The pace of change has either been too quick and without consultation, or too slow to date, raising concerns for both teachers and parents
- The achievability of initiatives has become a concern in the light of lengthy delays
- The unknown is how will the success of the NPIs be measured in order to identify the possible return on investment

As indicated in our responses to the Information Requests, the existing NPIs, and associated data projects, will retain a fundamental utility within a reconfigured education system, but are not sufficient to ensure that all students have access to high-quality, high-equity education.

	National Policy Initiative	
A (i)	Enhancing the Australian Curriculum to support teacher assessment of student attainment and growth against clear descriptors.	<p>The IEU believes that the review of the Australian curriculum and subsequent updated version addresses issues identified and does potentially better support teacher assessment of student attainment and growth against clear descriptors.</p> <p>Such effective revision however is dependent upon the relevant state authorities having the resources to strategically and effectively in-service and support staff in schools to fully understand and apply the emergent descriptors</p> <p>Thus the implementation of this NPI is very much resource dependent and without such, there will be negative impact on quality</p>
A (ii)	Assisting teachers monitor individual student progress and identify student learning needs through opt-in online and on demand student learning assessment tools with links to student learning resources, prioritising early years foundation skills	<p>The OFAI has the potential to streamline teacher work in formative assessment.</p> <p>However, concerns remain about the level of sophistication required of a useable platform, privacy of data held by the site, and the need to ensure the primacy of teacher judgement, both in terms of use of the OFAI and the professional development modules</p>
A (iii)	Reviewing senior secondary pathways into work, further education and training.	The IEU is supportive of many of the recommendations. Progress in this area has been slow
B (i)	Reviewing teacher workforce needs of the future to attract and retain the best and brightest to the teaching profession and attract teachers to areas of need.	The language used in relation to this NPI continues to suggest “review” rather than “response” We believe that the issues are well understood, but action to address the needs is not clearly defined

B (ii)	Strengthening the initial teacher education accreditation system.	The IEU responded to the ITE review and is supportive of many of the recommendations. There are outstanding matters in ITE that still need to be addressed, including equitable support for all those entering the teaching profession regardless of whether they be graduate or mid-career candidates.
C (i)	Implementing a national unique student identifier (USI) that meets national privacy requirements in order to support better understanding of student progression and improve the national evidence base.	The Unique Student Identifier, (USI) while possibly offering advantages for student employment and further education prospects, still poses concerns related to privacy, and accountability and workload issues for those charged with monitoring the USIs.
C (ii)	Establishing an independent national evidence institute to inform teacher practice, system improvement and policy development.	While the IEU is supportive of the establishment of AERO, ill-considered implementation of education/research-based initiatives in the absence of analysis on impact on workload and teacher workforce, is likely to have a negative impact on student outcomes. The IEU believes that AERO's work must include advice on implementation processes that respect school context and teacher agency.
C (iii)	Improving national data quality, consistency and collection to improve the national evidence base and inform policy development.	The IEU believes that purpose and impact must be taken into account when considering further national data quality, consistency and collection. The overall measurement must be to identify resource support and delivery for high quality education not a simple recognition of data collection. High quality education requires more than measuring for the sake of measuring data.

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