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Submission to the Productivity Commission's Inquiry into Mental Health

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Introduction

The Queensland Catholic Education Commission (QCEC) provides this submission in response to the Productivity Commission's draft report on Mental Health.

QCEC is the peak strategic body with state-wide responsibilities for Catholic schooling in Queensland. This submission is provided on behalf of the five Diocesan Catholic school authorities and 17 Religious Institutes and other incorporated bodies which, between them, operate a total of 306 Catholic schools that educate nearly 150,000 students in Queensland.

This submission focuses particularly on recommendation 17.5 of the draft report that each school should employ dedicated School Wellbeing Leaders.

Queensland Catholic schools

Currently there are 306 Catholic schools in Queensland educating 149,000 students with a roughly equal number of boys and girls.

There are 196 primary schools (with 65,776 students), 74 secondary schools (with 44,828 students) and 36 primary-secondary combined schools (with 39,556 students).

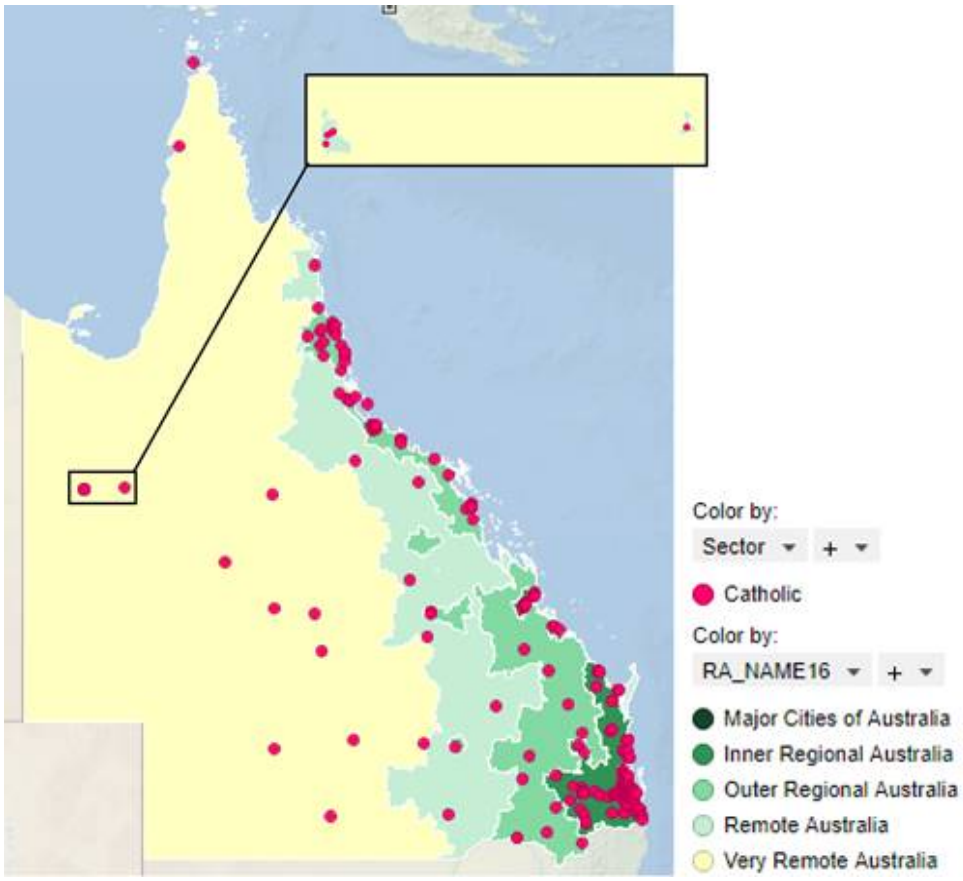
Sixteen boarding schools offer secondary education. The majority of our Queensland Catholic schools are co-educational (272 schools) with 19 girls only and 15 boys only schools.

There are also a number of Special Assistance Schools which offer opportunities for young people to re-engage in education in an alternative, flexible learning environment.

Queensland Catholic schools range in size from very small (< 5 primary/<100 secondary) to large (300+ primary/700+ secondary). More than half of all schools are classified as large schools and a quarter of schools are small schools. Special Assistance Schools and remote schools account for the majority of very small schools.

The majority of schools are in the major cities along the coast of Queensland. However, there are also a significant number of schools in regional and remote areas[1]. All very remote schools are small primary schools (total of 698 students).

Map 1: Catholic schools in Queensland



Student wellbeing in Queensland Catholic schools

Student wellbeing is a key priority for all Catholic schools in Queensland and Queensland Catholic School Authorities are developing and implementing comprehensive approaches to improving mental health and wellbeing of all students in Catholic schools through wellbeing frameworks, policies, procedures, resourcing and professional practices. They aim to build the capacity and resilience of school communities to ensure holistic growth is supported. Some Catholic School Authorities have also established working groups on mental health and wellbeing to:

- review current activity underway across schools and create a common language and shared understanding related to mental health and wellbeing
- recommend strategies for improving understanding and responses to mental health and wellbeing
- extend engagement and learning of school staff and families in responding to mental health and wellbeing needs of students.

Typically, wellbeing programs are at a school level. Table 1 provides a snapshot of programs offered at Queensland Catholic schools, many of which have a strong evidence base.

[1] The Accessibility and Remoteness Index of Australia (AREA+) is used as a measure of remoteness.

Table 1: Student wellbeing programs offered in Queensland Catholic schools

Circles Whole class social emotional program	123 Magic & Emotion Coaching Parenting Program	Fun with Feelings Program	Stop, Think, Do	Asteros
Aussie Optimism	BounceBack!	Bullying NoWay	Circle time on emotional regulation	Cool Kids/Anxiety
Friends for Life	Games factory	Girlz Power	Go! Strengths Programs	GoZen
Harnessing Superflex and the team to unthinkables	Mindtrain	Peaceful Kids	Pearls for Girls	Resourceful Adolescent program (RAP)
Rock and Water	Seasons for Growth	Second Step	Secret Agent Society	Zones of Regulation
Wise Wellness Program	You Can Do IT	Real Talk	Growth Mindset	CyberSafety
Elevate	Gambling education	End of School safety	'socially speaking' board games	Perceptual Motor Program
Building Resiliency in Young People	Beyond Blue's Sensibility Program	RISE UP	Fun Friends and Friends for Life	Mind Up
The Brave Program	Healthy Minds	The resiliency project	Love bites Triple P	Headstrong
Take action	Emotional literacy progam	Drum Beat	Heart Masters	Passport program

Proposed School Wellbeing Leaders (draft recommendation 17.5)

QCEC understands that the Productivity Commission sees the role of the School Wellbeing Leaders as

- coordinating the work of the school wellbeing team.
- establishing the needs of the school community and find suitable funding
- acting as the first point of contact for teachers concerned about students' mental health and wellbeing, and supporting students in accessing services, both within and outside of the school
- ensuring plans to support students with mental illness are implemented, and there is appropriate consultation with their family and mental healthcare providers
- overseeing the implementation of whole-of-school wellbeing programs
- developing and maintaining referral pathways to local community services.

The draft report notes that School Wellbeing Leaders should be part of the leadership team and should have minimal (if any) classroom duties. As the proposed role will not involve counselling individual students, it is argued in the report that they do not need to hold psychology qualifications, however, they need to have substantial knowledge of child social and emotional development and mental health. Additionally, the report notes that a teaching background is essential for School Wellbeing Leaders and that in school communities with a substantial proportion of Aboriginal and Torres Strait Islander or culturally and linguistically diverse families, School Wellbeing Leaders will require relevant cultural capability. There is little accompanying evidence to support the proposals that the School Wellbeing Leader be a member of the leadership team and, additionally, have a teaching background.

QCEC agrees that student wellbeing is a critical priority in all schools but wishes to note a number of concerns and questions regarding recommendation 17.5 of the draft report. We outline our concerns and queries below but request that the Australian Government further consult with the school sector in exploring this recommendation and its implications for stakeholders.

QCEC is concerned with how the Productivity Commission defines the role of School Wellbeing Leaders. For example, it may be unrealistic in large schools for School Wellbeing Leaders to be the first point of contact for all teachers. Further, QCEC questions if the requirement for minimal classroom duties is realistic in small schools.

QCEC observes that in most (if not all) Catholic schools in Queensland, School Wellbeing Leaders as defined in the draft report would be a new role quite distinct from the positions currently in place at Catholic schools in Queensland.

Catholic School Authorities advise that current role holders in Catholic schools with a focus on mental health and wellbeing include:

A. School leadership teams have a responsibility to enact the student wellbeing policy in schools. Specific leadership roles have a designated responsibility and these roles will differ across the primary, secondary and P-12 context. Examples include Assistant Principal Pastoral Care/Student Wellbeing and middle leaders with pastoral/wellbeing responsibilities.

B. Guidance Counsellors are key school-based role holders in providing proactive, preventative and early intervention for students with mental health concerns. In Queensland, guidance counsellors are generally required to be registered teachers with a Masters in Guidance and Counselling or registered psychologists. Guidance counsellors are not part of school Leadership Teams. It should be noted that some Catholic School Authorities employ school counsellors rather than guidance counsellors with school counsellors having a more limited role in the broader mental health and wellbeing planning realm.

C. Other school-based staff include campus ministers, pastoral leaders, school chaplains and student welfare workers. These roles have a focus on student wellbeing but may or may not require a teaching background and are typically not part of the leadership team. Chaplaincy and student welfare worker services are optional for schools and provide students and staff with social, emotional and spiritual support. They provide an additional adult role model in the school and enhance engagement with the broader community including parents.[2] Chaplains and student welfare workers do not provide professional counselling services or take on roles which are the domain of other staff members, for example, case management of an individual student. For the three years 2020-2022, 112 Queensland Catholic schools have secured funding for chaplains or student welfare workers under the National School Chaplaincy (NSCP) and Student Welfare Workers (SWW) Programs.[3]

In addition, Catholic School Authorities that run more than one school employ staff to support the professional practice of school-based staff in implementing policy and procedures to support student mental health and wellbeing (e.g. senior education officers). Further, Catholic School Authorities work with external organisations to provide mental health and wellbeing services to students and families, including Be You, Head Space School Support and EdLinQ.

QCEC advises that while Catholic schools in Queensland and their governing school authorities have multiple roles and responsibilities as described above, the role description outlined for School Wellbeing Leaders on page 687 of the draft report does not align with any existing roles in Queensland Catholic schools.

One Catholic School Authority has provided a table to illustrate this point (table 2).

[2] Queensland Department of Education, Chaplaincy and student welfare worker services

[3] The maximum available funding provided for each school is $20,280 (8 hours service per school week) with remote and very remote schools provided up to $24,698.

Table 2: Duties of School Wellbeing Leaders vis-à-vis other role holders

Proposed role description/duties of a wellbeing leader	School Guidance Counsellor	Others performing this function
Coordinating the work of the school wellbeing team, which can include a school psychologist, counsellor, social worker, school nurse, chaplain, local Aboriginal community leader or health worker, peer workers and others. This should include clear definitions of the roles and responsibilities of wellbeing staff and pathways for student referrals within the school.	No Involvement – 38.7% Minor Involvement – 48.4% Major Involvement – 12.9%	Principal – 19% Deputy Principal – 10% * Assistant Principal – 19% Learning Support Teacher (LST) – 26% Middle Leaders – 13%
Establishing the needs of the school community, in terms of additional programs or staff members required and working with school leadership and government agencies to find suitable funding.	No Involvement – 45.2% Minor Involvement – 45.2% Major Involvement – 9.7%	Principal – 65% Deputy Principal – 6%* Assistant Principal – 26% LST – 26% Middle Leaders – 10%
Acting as the first point of contact for teachers concerned about students' mental health and wellbeing, and supporting students in accessing services, both within and outside of the school.	No Involvement – 19.4% Minor Involvement – 16.1% Major Involvement – 64.5%	Principal – 45% Deputy Principal – 16%* LST – 55% Middle Leaders – 23%
Ensuring plans to support students with mental illness are implemented and there is appropriate consultation with their family and mental healthcare providers.	No Involvement – 9.7% Minor Involvement – 25.8% Major Involvement – 64.5%	Principal – 16% Deputy Principal – 10%* Assistant Principal – 6% LST – 45% Middle Leaders – 13%
Overseeing the implementation of whole-of-school wellbeing programs, including identifying the most suitable programs for the school community, developing the skill sets of teachers who will be delivering the programs, monitoring outcomes and supporting school staff to incorporate wellbeing practices in their day-to-day teaching.	No Involvement – 32.3% Minor Involvement – 48.4% Major Involvement – 19.4%	Principal – 61% Deputy Principal – 6%* Assistant Principal – 29% LST – 29% Middle Leaders – 16%
Developing and maintaining referral pathways to local community services, including community mental health services, parenting programs and support services for young carers.	No Involvement – 9.7% Minor Involvement – 35.5% Major Involvement – 54.8%	Principal – 39% Deputy Principal – 3%* Assistant Principal – 3% LST – 42% Middle Leaders – 3%

*not all schools have a position of Deputy Principal

Given the proposed School Wellbeing Leaders are essentially new positions, there is a very strong argument for additional government funding of these positions if they were to be mandated.

Before providing QCEC's response to the three specific information requests by the Productivity Commission in relation to the proposed School Wellbeing Leaders, QCEC wishes to express its concern with the Productivity Commission's recommendation that School Wellbeing Leaders should be accountable for improvements in wellbeing (page 688).

While schools play a large part in student wellbeing, it needs to be recognised that student wellbeing is a multi-dimensional concept with many different domains including physical, psychological, cognitive, social and personal and spiritual domains. It is not reasonable to hold one person or role accountable for improvements in wellbeing.

QCEC recommends that the statement on page 688 is reworded to reflect the complexities involved in student wellbeing and the complementary roles of families, communities, teachers and other professionals.

The report further notes that data collected in schools should be used by governments to evaluate the effectiveness of this policy initiative and generate more insights into best practice in school-based mental health and wellbeing. While QCEC agrees with the intent of this assertion, it recommends that schools should be consulted on what information should be collected and how it should be reported. This will ensure data collected is meaningful and consistently collected by all schools to facilitate relevant comparisons.

Funding the employment of School Wellbeing Leaders

As noted above, School Wellbeing Leaders are proposed new school resources aimed at complementing resources currently available. If these positions become a government requirement, then QCEC will strongly argue for additional government funding as schools currently have no capacity to absorb the cost associated with the employment of School Wellbeing Leaders.

Queensland Catholic School Authorities advise that funding these positions would impose a heavy cost burden. QCEC's preliminary estimates indicate that establishing School Wellbeing Leaders as per the Productivity Commission's recommendation would cost Queensland Catholic Schools around $30million per year.

It should also be noted that there will be additional costs for maintaining a high standard of professional development of these role holders.

Information request 17.1a

What existing funding could State and Territory Governments redirect towards employing wellbeing leaders in government schools?

QCEC cautions against redirecting funding towards employing School Wellbeing Leaders in government schools if this will impact on funding for Catholic schools in Queensland or reduces funding to any other critical area of need in schools.

Information request 17.1b

To what extent should the Australian Government contribute to funding their employment in non-government schools?

As outlined above, School Wellbeing Leaders will effectively result in new positions and as such require additional government funding.

Catholic School Authorities do not have the financial capacity in the current staffing composition to resource School Wellbeing Leaders. Given the school resourcing review currently being implemented, there is an increasing requirement for community contribution toward the cost of non-government education. Increasing the provision of services without additional government funding would require a greater contribution from communities. In many areas in Queensland, especially those affected by drought, fee increases associated with the creation of new positions are not possible.

QCEC also notes that the costs to school authorities in employing School Wellbeing Leaders will not be the same across Queensland, with regional and remote schools needing to spend proportionately more due to increased travel costs. These costs will be magnified for small schools that will only require the services of a School Wellbeing Leader on a part-time basis.

Queensland's population distribution is far more dispersed than the rest of the highly urbanised Australia and more than half of Queensland's population lives outside the greater metropolitan area of Brisbane.

Table 3: Location of Queensland Catholic schools (with student numbers FTE in brackets)

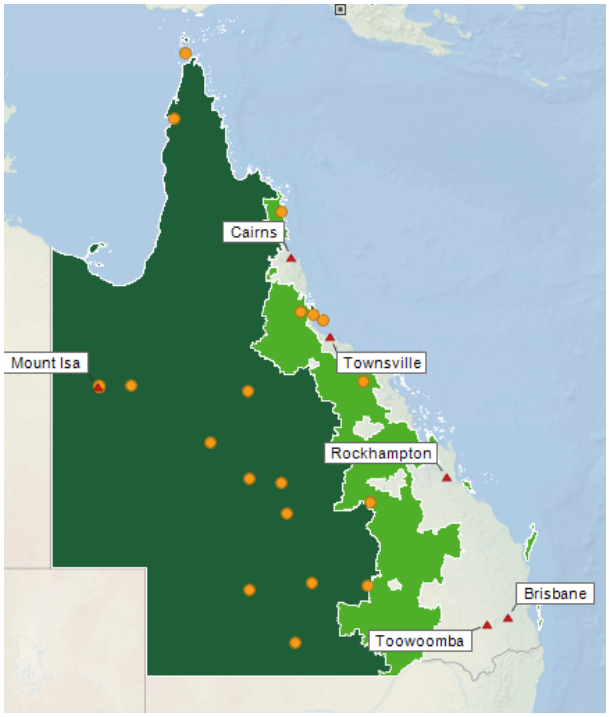
School level	School size	Major cities	Inner regional	Outer regional	Remote	Very remote
Primary	Small School	13 (1,994)	13 (1,593)	15 (1,415)	7 (735)	11 (763)
	Medium School	11 (2,613)	9 (2,362)	7 (1,849)	1 (294)	
	Large School	69 (35,367)	22 (8,688)	18 (8,103)		
Secondary	Very Small School	5 (422)	3 (211)		2 (127)	
	Small School	7 (2,213)	8 (2,891)	6 (1,863)	2 (653)	
	Medium School	3 (1,783)	2 (1,221)	4 (2,446)		
	Large School	23 (21,781)	6 (6,542)	3 (2,675)		
Combined	Small School	3(569)			1 (136)	
	Medium School		1 (426)	2 (804)		
	Large School	16 (23,082)	6 (5,512)	7 (7,769)		

NOTE: Small schools are schools with <5 students (primary) and <100 students (secondary). Large schools are schools with 300+ students (primary) and 700+ students (secondary)

While the majority of Catholic school students attend schools in major cities and inner regional areas, twenty percent of students attend 86 schools spread across the vast areas classified as outer regional, remote and very remote Queensland. These schools are typically small primary schools.

The requirement to have School Wellbeing Leaders at each of these schools would come at a significant cost to school authorities with schools in these remote locations.

Map 2: Remote and very remote Catholic schools in Queensland



Information request 17.1c
What would be the number of students enrolled in a school above which a full-time School Wellbeing Leader would be required?

QCEC believes that the ratio of School Wellbeing Leaders to students requires further discussion.

On page 689 of the draft report the Productivity Commission suggests that schools with more than 200 students should have a full-time School Wellbeing Leader. QCEC believes that this recommendation is too simplistic and does not adequately consider factors affecting the need for these positions, including the age and background of students.

QCEC cautions against a one size fits all approach and suggests that the Productivity Commission consider the different contexts in which primary and secondary schools operate and how the location of schools and the characteristics of the student cohort impact on the needs for Student Wellbeing Leaders.

QCEC would also like to see increased consideration for remote and very remote schools and schools with a higher percentage of indigenous students.

Table 4: Location of Catholic schools in Queensland and percentage of Indigenous students

Remoteness	Education level	Indigenous	Total	% Indigenous
Major cities	Primary	1,033.4	47,229.0	2.19%
	Secondary	1,133.0	42,595.5	2.66%
Inner regional	Primary	872.2	15,063.2	5.79%
	Secondary	995.0	14,382.9	6.92%
Outer regional	Primary	1,130.6	15,788.6	7.16%
	Secondary	1,090.4	11,134.6	9.79%
Remote	Primary	227.0	1,141.4	19.89%
	Secondary	324.0	804.0	40.30%
Very remote	Primary	192.0	763.0	25.16%

According to the Aboriginal and Torres Strait Islander adolescent and youth health and wellbeing 2018 report by Australian Institute of Health and Welfare, 2 in 5 young Indigenous people suffer from mental health conditions with anxiety reported as the most common long-term mental health condition. Mortality due to international self-harm is twice as high in remote and very remote areas. According to Creative Spirits 80 per cent of youth suicides are by Aboriginal people aged 10 -24.

QCEC suggests that these statistics demand increased focus on how best to address mental health in remote and very remote schools, regardless of their size.

Conclusion
QCEC agrees with draft report that early intervention is key to improving mental health and wellbeing and that schools provide significant support to the wellbeing of their students, particularly through proactive programs, dedicated staff and ongoing care and support. Schools also play an important role in working closely and collaboratively with families and external service providers to support the wellbeing of young people.

QCEC concurs that the mental health and wellbeing of students has a substantial effect on their academic learning outcomes and the classroom environment and appreciates the Productivity

Commission's acknowledgement that schools are already investing significant efforts in student wellbeing.

QCEC notes that the role of the proposed School Wellbeing Leaders does not align with the current roles of school staff. If schools were mandated to have School Wellbeing Leaders as defined by the Productivity Commission, additional government funding would be necessary.

QCEC cautions against a one size fits all approach when determining the need for a full-time School Wellbeing Leader. QCEC would like to see the Commission engage in more detailed discussion around the proposed ratio, including consideration of school type, size and location and student demographics.

QCEC appreciates the opportunity to provide feedback on the Commission's draft report and would be pleased to discuss the submission in more detail with the Commission.

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