



Independent Schools  
Council of Australia

LT015

8 February 2012

Education and Training Workforce: Schools  
Productivity Commission  
Locked Bag 2, Collins Street East  
MELBOURNE VIC 8003

Dear Commissioners

The Independent Schools Council of Australia (ISCA) is pleased to have this opportunity to provide feedback on the Productivity Commission's Draft Research Report: Schools Workforce and has welcomed the other opportunities provided to ISCA by the Productivity Commission for consultation on the draft report.

ISCA previously made a submission to the study on 19 August 2011. ISCA representatives have additionally provided feedback on the draft report at the roundtable in Canberra on 5 December 2011.

ISCA believes that the draft report represents a clear and extensive discussion of many of the significant issues associated with the schools workforce in Australia in the short and long term future.

The independent sector notes that the Commission's draft report has addressed many of the topics highlighted by ISCA in our previous submission and would like to further specifically comment on only one of the draft recommendations and one other matter raised in the draft report.

The independent sector strongly supports Draft Recommendation 11.1 that "the Ministerial Council for Education, Early Childhood Development and Youth Affairs should ensure that non-government schools...are appropriately represented in high level policy-making processes in the schools area". ISCA believes that implementation of this recommendation would greatly facilitate efforts to maximise the efficiency and effectiveness of the schools workforce.

Discussing some 'Current approaches to performance management' for teachers (Chapter 6.1) the draft report refers to a recent publication 'OECD Reviews of Evaluation and Assessment in Education – Australia'. This OECD report contains a number of comments which reveal misconceptions by the Review team regarding the non-government sector in Australia including the level of accountability for teachers as referred to in the Commission's draft report.



In ISCA's opinion the OECD report as a whole failed to demonstrate a clear understanding of the nature and operation of the non-government sector in Australia and the level of engagement of the sector in the wider education environment.

Under the terms of their Funding Agreement, independent schools are obliged to work cooperatively with their state and territory government to support that government in fulfilling its obligations under the National Education Agreement. Independent schools must also participate in the Australian Government's reform initiatives including those focused on teacher quality and standards.

The focus of the OECD report was on evaluation and assessment practices used to evaluate the performance of school systems. It would appear that the Review team struggled with the concept that unlike other sectors in Australian education, the majority of independent schools operate autonomously. Independent schools do not rely on central bureaucracies or bodies, and are separately accountable to their parent and school communities. As schools in the sector operate independently, sector-wide evaluation and assessment is not undertaken. The sector is criticised in the report for not conducting sector-wide analysis of performance information. This is to fundamentally misunderstand the nature of the sector.

Upon release of this report, ISCA wrote to the Minister for School Education, Early Childhood and Youth, the Hon Peter Garrett AM MP seeking his support in advising the OECD of these shortcomings and seeking to have the report amended to more appropriately reflect the facts and the role played by the independent schools sector in Australia.

However, ISCA agrees with the Commission's emphasis in the draft report that performance management is an important component of teacher professional development, and that schools play a vital role in providing teachers with the feedback and support that they need.

ISCA appreciates the opportunity to comment on the draft Report and looks forward to the release of the Commission's final report.

Yours sincerely

Bill Daniels  
**Executive Director**