



Feedback to Review to Inform a Better and Fairer Education System

August 2023

Introduction

The Federation of Parents and Citizens Associations of New South Wales (P&C Federation) is grateful for the opportunity to make a submission to the Review to Inform a Better and Fairer Education System Consultation Paper (hereafter Consultation Paper).

P&C Federation is the representative voice for parents and students in public education in NSW. With over 1800 member associations, 5000 association executive members, and 820,000 public school children and their parents making P&C Associations one of the largest volunteer-based organisations within Australia. Our understanding of the issues within education is broad and carries with it the voice of a substantial body of parents and carers.

The core belief of P&C Federation is that the education of our children and youth is the most fundamental means of ensuring individual success and success as a nation. Government's primary responsibility is to ensure education is equitable, well-resourced and fully funded. It is with this responsibility in mind that we make the following recommendations and provide the following feedback.

Recommendation

Governments negotiate funding arrangements that stop overfunding the private education sector at the expense of public schools. This situation has led to the decline in educational standards in Australia relative to much of the world, driven by our increasing concentration of disadvantaged students in disadvantaged schools. The so-called "exodus" of students to private schools in past decades has been exacerbated by a funding arrangement that permitted 36 private schools in NSW to receive more than \$1M of Government funding in excess of Schooling Resource Standard (SRS) calculations in 2020¹.

The bilateral agreement currently in place between the Australian Government and NSW Government does not provide 100% of the SRS level of funding for government schools. Despite recent public commitments to provide this level of funding by 2025 the current agreement indeed *cannot* provide 100% of the SRS direct to schools while 4% of the total SRS for the government sector each year is directed toward funding the NSW Education Standards Authority and to capital depreciation. We believe providing public schools their full SRS funding is a necessary first step to ensuring the resourcing provided to the government school sector is fair and equitable.

We would also point out the SRS represents the *minimum* level of funding required for 80% of students to attain minimum acceptable standards of literacy and numeracy. While it was not designed as such, successive Governments have treated it as an aspirational target. By setting a standard that has become a de facto aspirational standard so low, Governments have locked in a maximum funding position that permits almost one million students in Australia to fall short of baseline standards.

¹ Adam Rorris, 'NSW — Public Funding Schools and the School Resourcing Standard', briefing note prepared for the NSW Teachers Federation

Response to Chapter One: Improving student outcomes – including for students most at risk of falling behind

The NSRA relies heavily on NAPLAN results to measure student outcomes. Whilst this data is important, the P&C Federation has misgivings about using this data as the primary measure of our education system's performance. In the P&C Federation's view, improvements are best sought by improving pedagogy and classroom practices. This means the central component to improving student outcomes is strengthening the teaching profession and measuring this accordingly

In the P&C Federation's view, while NAPLAN data is important in many ways, it does come with the following inherent limitations:

- NAPLAN tests are narrow, point-in-time snapshots of how students perform within limited (albeit important) learning domains. This may show general long-term trends, but is not a holistic view of education and reveals little about the state of teaching and learning within schools.
- NAPLAN results give no insight into why results may increase, decrease or remain static. Some of this may reflect random individual variation (which may impact individual NAPLAN results by as much as $\pm 12\%$ ²) and the size of schools (as smaller schools may show more significant natural variation in their scores than larger schools).
- The publication of school NAPLAN results on the My School website has created de facto league tables. This has made NAPLAN a high-stakes test, which has caused several problems:
 - It pits schools against each other as they seek to maximise NAPLAN results for fear of losing students to other "higher-performing" schools. Anecdotally, we have heard cases of schools gaming results by asking underperforming students to not sit NAPLAN for fear of lowering the school's ranking, though, to our knowledge, this phenomenon has never been investigated.
 - It has led to teaching-to-the-test approaches, with large parts of school terms devoted to preparing students for NAPLAN tests rather than teaching the curriculum. This risks undermining student ability to meet curriculum outcomes once NAPLAN is completed.
 - More fundamentally, it has inadvertently produced an environment where the interests of schools, systems and governments are prioritised over the interests of individual students.
- There have been disruptions in recent years that cast ongoing doubt on the utility of NAPLAN results:
 - In 2018-2019, the transition period resulted in both paper-based and on-line test results being used simultaneously. Although ACARA insists the results of both versions are comparable, there are serious doubts about the validity of this argument. These doubts were further compounded by significant technical issues experienced with the 2018 and 2019 NAPLAN Online tests.
 - In 2020, education ministers decided to cancel NAPLAN as a reaction to the COVID-19 pandemic.

The P&C Federation reiterates its preference for the following model for what nationalised assessment should consist of:

- First and foremost, it must be a diagnostic tool that informs teaching and learning.

² Wu. 2009. *Interpreting NAPLAN Results for the Layperson*.

- It must help inform parents of their child's progress against the curriculum. Parents not only need to know but have a right to know how their child is performing and how they and the school can further support student learning.
- It must be low-impact, non-disruptive testing: as far as possible, it must be part and parcel of everyday teaching and learning. This would reduce the considerable stress generated by mass testing, remove the teach-to-the-test mentality, remove the logistical nightmare from schools and refocus efforts on child-centric learning. We would argue that this change alone would significantly improve student outcomes.
- Any standardised testing must provide localised and timely data on student performance for teachers and parents and help quickly identify any trends that need to be addressed for the child, teacher or the school.
- School-based test data would then feed outwards, deidentified, to inform systems and governments on the bigger picture regarding the performance of regions, states/territories and the nation, thereby informing policy.
- Schools and systems must be accountable for their overall performance within the context of their environment. The focus here should be on improvement through targeted, non-punitive measures.
- Testing and assessment must be directly linked to and be embedded in the curriculum. Anything else detracts from teaching and learning.
- Teachers are best placed to know how a child is progressing and report to parents. This is why we support using more frequent low-stakes, class-based assessments as the front-line tool in the overall assessment of children.
- Any standardised testing regime must be inherently transparent in its methodology.

Response to Chapter Two: Improving student mental health and wellbeing

The P&C Federation supports the tracking of student wellbeing.

However, as the Consultation Paper outlines, 'wellbeing' is a highly flexible term with currently no clear definition between jurisdictions or government agencies. Some use it as a synonym for mental health, others define wellbeing more broadly than only mental health.

If measuring wellbeing is to be an effective use of resources, it is crucial to define both the term and what precisely is to be measured. The P&C Federation would suggest that potential parameters for measuring wellbeing should include the following:

- Student attendance rates
- Medicare aggregate information about mental health referrals in young people
- Self-reported anonymous measures of physical and mental health

Some steps to do this may include:

- assessing student wellbeing as part of the NAPLAN process to gauge children's level of engagement at school and understand their issues, fears and aspirations.
- Funding and resourcing for health and wellbeing initiatives.
- Gathering data around student attainment, retention, wellbeing.

However, the following caveats to this would apply:

1. Any measurement of student wellbeing must be done in a manner that does not create any additional burden on schools, teachers, parents or students. It must not interrupt teaching and learning,
2. The data and privacy of the student and their families must be protected.
3. Any such data collection must be tied to an outcome, goal or initiative to drive positive outcomes.

Response to Chapter Three: Our current and future teachers

The attraction and retainment of teachers is an ongoing and complex challenge for schools. Although the issue of teacher shortages is not new, it has become more prevalent in recent years. While the causes are multi-faceted, the causes include the following:

1. A drop in the number of students enrolling and completing a teaching degree
 - a. Figures from the Australian Institute for Teaching and School Leadership (AITSL) show significant drops in both commencement and completion rates of students in teaching courses.³ Although the causes for these drops are difficult to precisely gauge, the perception of teaching as an unattractive profession is likely to be a factor.
2. A high workload, stress and lack of autonomy resulting from an ever-increasing administrative burden.
 - a. This is among the most commonly heard reasons for teachers' dissatisfaction within the profession, which may spur them to leave for greater opportunities in another profession, including better salaries, less stress and greater autonomy.
3. The casualisation of teaching
 - a. Approximately one in five teachers in NSW are temporary, and in some schools there are more temporary and casual teachers than temporary staff. This has several broad impacts:
 - i. Teachers are more likely to become demoralised by the lack of stable income and could contribute them to leave for other professions that offer permanency.
 - ii. The quality of teaching may be impacted, due to the length of a temporary teacher's engagement, and their relative lack of professional learning and sense of belonging. Parents often comment negatively about the use of temporary and casual teachers, and can often give examples of casual teachers simply acting as a child-minding service.

The P&C Federation makes the following suggestions to Government:

1. Undertake an urgent national strategy to promote teaching as a profession including incentive packages to entice ITE enrolments for school leavers and incentivise mid-career retraining to attract other professions into teaching.
2. Significantly reduce the administrative burden of teachers, allowing them to spend more time teaching and reducing stress levels.

³ <https://www.aitsl.edu.au/research/australian-teacher-workforce-data/atwdreports/national-trends-ite-pipeline>

3. Ensure that all schools have the necessary funding to ensure they can employ appropriate numbers of staff.
4. Each teaching course should include practicums for at least a term each year, starting in the first year of teaching courses, so that poor performers can be identified early.
5. Practicums should make up at least 20% of ITE courses.
6. Improve the quality and reputation of teaching, and ensure parents are aware of the processes in place for registration and further accreditation.
7. Consider implementing a program of permanency for a large number of temporary teachers, including a cap on the time a teacher can remain temporary, after which they are made permanent.
8. Consider implementing a maximum proportion of teachers whom school principals can employ as a temporary teacher.
9. Consider encouraging and facilitating of dual professionals to enter the teaching profession.

Response to Chapter Four: Collecting data to inform decision-making and boost student outcomes

Although the P&C Federation does not object to the concept of connecting datasets across jurisdictions, we have several caveats:

1. The collection must be clearly tied to improving student outcomes. If no impact on student outcomes can be demonstrated, we question the need for this data collection.
2. Before any new model is implemented, it is crucial that there are clear guidelines around:
 - a. How this data is to be used.
 - b. Who has access to it.
 - c. How privacy and security issues, including the sharing of data, will be addressed.

The P&C Federation has heard concerns from parents about data on their children being sold to other organisations and being used inappropriately to target students and their families.

One of the main data-collecting and sharing mechanism mentioned in both the Consultation Paper and Productivity Commission report is the Unique Student Identifier (USI). Established under the *Student Identifiers Act 2014* for higher education students, several jurisdictions and stakeholders have raised the prospect of extending the USI to primary and secondary school students,⁴ although we are unaware how the above concerns are being addressed. Considering NSW already collects a large amount of data through, for example, the Centre for Education Statistics and Evaluation (CESE), we are unsure whether a nationally centralised data collection system would benefit students.

Response to Chapter Five: Funding transparency and accountability

In addition to the need for government schools to be funded the full SRS, as outlined in the preamble, the P&C Federation supports the view of the Productivity Commission and Consultation Paper that Approved Authorities should be required to publicise their models and methodologies used to calculate and distribute funding. Visibility is crucial to ensuring funding models are effective and fit for purpose.

⁴ 'No one really knows': Senate inquiry into school refusal told first step is to track 'invisible' students. *The Guardian*. 25 February 2023

However, we are wary of the suggestion in the Consultation Paper of requiring schools to publicise how their funding is spent. This information should already be included in schools' annual reports as a matter of course, and such reports are publicly available. We are concerned that a requirement on schools to also report this elsewhere may unnecessarily add to the administrative burden of schools, especially as this information should already be available to the NSW Department of Education. As the Consultation Paper notes most Approved Authorities collect and centrally hold relevant data. For this reason, we would suggest the NSRA restrict its requirements to Approved Authorities, while requirements on schools are better set at a State/Territory level.