

Review to Inform a Better and Fairer Education System

NSW Government submission

August 2023

Acknowledgement of Country

The NSW Government acknowledges the Traditional Custodians of the lands where we work and live. We celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of NSW.

We pay our respects to Elders past, present and emerging and acknowledge the Aboriginal and Torres Strait Islander people that contributed to the development of this Submission.

We advise this resource may contain images, or names of deceased persons in photographs or historical content.

Review to Inform a Better and Fairer Education System

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Executive Summary

The NSW Government welcomes the *Review to Inform a Better and Fairer Education System*, and thanks the Panel for the opportunity to contribute to the Review.

The NSW Government is firmly committed to rebuilding the public education system in NSW and views the next National School Reform Agreement (NSRA) as a critical opportunity to support this commitment. Importantly, both the NSW and Commonwealth Governments have committed to reaching 100% of the School Resourcing Standard (SRS) over the life of the next NSRA. This is a historic commitment which will improve outcomes for students, teachers, leaders, and schools in government schools across NSW.

The next NSRA provides a chance to reset national commitments and policy levers to set the conditions for students to flourish and to ensure teachers and schools are well supported. It also provides an opportunity for all governments to work together to address ongoing challenges in the education system, including:

- the need for schools to have a core focus on teaching and learning without layering additional responsibilities on top
- the growing concentration of disadvantaged cohorts and complexity within the government school system, and the need to ensure that our education system delivers fair and equitable outcomes
- rebuilding our teaching profession, including by respecting teacher judgement, and demonstrating confidence in our teachers
- reducing teacher workload and administration burden.

In doing so, the NSW Government is firmly of the view that the NSRA must:

- fairly balance effort between Commonwealth and State and Territory governments
- seek to level the playing field across sectors by ensuring equitable funding for schools and conditions for teachers – delivering on the principles of needs-based, sector blind funding
- recognise the role of State and Territory governments in leading their education systems, while also collaborating on initiatives where national collaboration and effort will genuinely improve outcomes.

Across this submission, the NSW Government recommends that the Expert Panel consider:

Meeting the needs of all students and shaping the nation's future

- Supporting literacy and numeracy outcomes for all students should be a focus in the next NSRA

Improving student outcomes – including students most at risk of falling behind

- The next NSRA should seek to address the impact of concentrated disadvantage
- The next NSRA should be sensitive to the particular challenges of supporting students with disability
- Closing learning and attainment gaps for priority equity groups must continue to be prioritised in national targets and reforms
- Efforts to improve outcomes for Aboriginal and Torres Strait Islander students must take a community approach

- The next NSRA should be sensitive to Regional, Rural and Remote contexts and maintain flexibility for jurisdictions to tailor support according to their contexts
- Targets should remain aspirational as all schools have not been receiving at least 100% of the SRS for a suitable period of time

Improving student mental health and wellbeing

- Any initiatives should focus on inclusive education, belonging and student voice as integral school-based contributors to student wellbeing
- Wellbeing initiatives must be adaptable to different needs in different contexts and allow for fluctuations in impact, based on a range of factors
- Existing measures and initiatives in NSW and nationally should be leveraged where appropriate
- Existing data on attendance can be used as a proxy for wellbeing

Our current and future teachers

- Future national initiatives should build on existing programs by complementing their activities, addressing their limitations or implementing their findings
- Efforts to attract and retain teachers should focus on need, diversity and location
- Nationally, we should increase support for Aboriginal and Torres Strait Islander peoples to participate in education as teachers and school leaders
- National commitments to teacher workload reduction should be more ambitious
- The next NSRA should act as a platform for national solutions to workforce issues

Collecting data to inform decision-making and boost student outcomes

- Data collection should adopt the principle of single provision, multiple use, where possible
- A catalogue of education data should be established to enhance decision-making and inform policy
- Indigenous Data Sovereignty must be formally embedded in policy
- NSW supports strategically sharing data and insights where a clear purpose is identified, and any costs and risks are mitigated
- Progress made against National Policy Initiatives from the current NSRA should be used to ensure the potential benefits of those initiatives are realised

Funding transparency and accountability

- Systems should retain the current level of flexibility to distribute recurrent funding according to school and student need
- Educational goals and programs should account for state contexts and local decision-making
- The next NSRA needs fewer and more focused National Policy Initiatives
- Accountability and transparency reforms should bolster a mutual commitment to improving education
- Accountability measures should consider potential impact on teacher workload.

The state of education in NSW

NSW has a long history of school education from the late 1700s. However, we also recognise the teaching and learning practices of the first educators – Aboriginal peoples on whose land all schools are located.

This year, NSW celebrates 175 years of public education in NSW. The first public school, Kempsey National School, opened in 1848 and by 1851, there were more than 37 public schools in operation in NSW. Today, there are more than 2,200 government schools and over 960 non-government schools operating in NSW. Whilst this milestone provides an opportunity for celebration, we also recognise that historically, NSW policy has not resulted in positive outcomes for all students. We note the impacts of this policy and are committed to an education system provides equity for all.

Across NSW, there are more than 1.2 million students across primary and secondary schools, with more than 790,000 students enrolled in the government sector, 263,000 in the Catholic sector and 188,000 in the Independent sector.

Of all students enrolled in NSW schools, there are:

- 698,228 primary students
- 543,336 secondary students
- 290,849 students attending regional or remote schools
- 85,298 Aboriginal students
- 279,352 students with disability
- 306,506 students in the lowest SEA quarter
- 450,027 students with a language background other than English.¹

The NSW Government is committed to creating an outstanding and equitable education system that uplifts trust and pride in the teaching profession.

Both the NSW and Commonwealth Governments have committed to achieving full and fair funding for all schools. This includes a commitment to reach 100% of the School Resourcing Standard for NSW government schools over the life of the next National School Reform Agreement, supported by investments such as the NSW Government’s Education Future Fund.

In support of the Government’s commitment to public education, the NSW Department of Education is currently seeking feedback and working closely with partners and stakeholders on a new Plan for Public Education. The Plan, informed by evidence and insights from teachers, school staff, education partners, parents, and students across NSW, prioritises:

- Equity and excellence in education
- Learning and achievement
- Wellbeing
- Staff development
- Workload reduction
- Communication and transparency.

The draft Plan reflects much of the focus of the consultation paper released by the Panel.

¹ National Report on Schooling & School profile data. Accessed 24/07/2023. Figures are derived.

1 Meeting the needs of all students and shaping the nation's future

There is an extensive body of research, including that considered by the 2011 Review of Funding for Schooling (Gonski Review), about the complex and interrelated effects of disadvantage experienced by communities and impacts on life-long outcomes, including education.

1.1.1 Supporting literacy and numeracy outcomes for all students should be a focus in the next NSRA

A focus on improving literacy and numeracy for all students would help to achieve greater equity in proficient levels of achievement amongst students – as reflected in the *Alice Springs (Mparntwe) Education Declaration*. Literacy and numeracy are the 'passport' to all other learning, any improvement would help to have a direct and positive impact on their future economic and social wellbeing.

It is important that any targets or expectations set for student learning are geared toward growth for all learners, rather than focusing only on increasing or decreasing the number of students at a certain level of proficiency. This will support schools to meet each student at the point of need and provide the targeted teaching required for learning progress.

In considering how to best measure improved literacy and numeracy for all students, it is critical that the focus is not solely on NAPLAN. While NAPLAN is useful to track trends in students' achievements over time, NAPLAN must be seen in the broader context of how teachers, schools and families understand student progression, which includes the important role of teacher judgment. Seeing NAPLAN as part of a broader toolkit used to understand student growth and progression in literacy and numeracy also avoids driving negative behaviours or creating unintended consequences.

1.1.2 NSW is already leading the way and delivering evidence-based initiatives

Across both government and non-government schools, NSW is supporting evidence-based practice in a number of ways including:

- Early evaluations of cross-sectoral small-group tuition indicate that it has improved student confidence and engagement in learning. The smaller group format and targeted instruction have resulted in noticeable progress in phonics recall and comprehension schema, which have been observed and acknowledged by teachers, students, and parents through ongoing assessments and feedback. The program has had a significant impact on student development resulting in growth that would not have been achievable in the classroom alone. The program has also successfully supported students with the greatest learning needs in achieving small to moderate growth in areas of literacy and numeracy, effectively achieving the program's purpose.
- The Numeracy Content Endorsed Course was created by the NSW Education Standards Authority as an alternative mathematics offering in Stage 6 and piloted in 2019 and 2020. The course is focused on the development and consolidation of core numeracy skills through authentic and relevant learning scenarios. The NSW Centre for Education Statistics and Evaluation's (CESE) evaluation found that the course increased Stage 6 mathematics participation among Year 11 students by approximately two to five percentage points in 2020.

- Aboriginal Learning and Engagement Centres (AL&ECs) in NSW government schools aim to enhance outcomes for secondary Aboriginal and/or Torres Strait Islander students through the provision of wellbeing, academic and cultural support. Tell Them From Me survey data from 2019 to 2021 and 2022 has shown an increase in students feeling good about their culture at school and their teachers' understanding of their culture at schools with AL&ECs when compared to schools without AL&ECs across the state. School-based apprenticeships and traineeships (SBATs) are available to all Year 10, 11 and 12 high school students in NSW and allows students to commence an apprenticeship or complete a traineeship while at school. Some apprenticeships and traineeships can contribute towards the ATAR.
- High Potential and Gifted Education Policy applies to all NSW public schools, teachers, and students. It describes a framework to develop the talent of high potential and gifted students. The policy provides advice to implement effective learning and teaching practices. The policy promotes engagement and challenge for every student in every school across intellectual, creative, social-emotional and physical domains of potential, while explicitly identifying and addressing the learning needs of high potential and gifted students.

2 Improving student outcomes – including students most at risk of falling behind

Education is pivotal to ensuring future success in life, particularly for students experiencing disadvantage. NSW prioritises and administers several programs to address disadvantage in schools, however, we see opportunity in national collaboration to strengthen supports for student cohorts with complex needs or who experience disadvantage. The next NSRA provides an opportunity to address the impact of concentrated disadvantage in the school system.

2.1.1 The next NSRA should seek to address the impact of concentrated disadvantage

It is well established that educational outcomes are negatively impacted by social and economic disadvantage.² The Commonwealth’s school funding model acknowledges this by including a specific SRS loading to account for Socio-Educational Advantage (SEA), as defined by the *Australian Education Act 2013*.

Based on the 2018 OECD Programme for International Student Assessment (PISA), Australia overall has less social segregation between the most advantaged and disadvantaged students than the OECD average.³ However, when distinguished by school sectors, Australia has the 12th highest level of segregation in government schools.⁴ The OECD’s assessment shows that the concentration of students experiencing socio-economic disadvantage in Australia’s government schools is among the highest in the world.

The level of socio-educational disadvantage in NSW schools is disproportionately split across the government and non-government sectors, with 55.8% of students in public schools in the bottom two Socio-Educational Advantage (SEA) quarters compared to 34.9% in Catholic and Independent schools (2022).

Table 1: Student SEA quarters by school sector, NSW 2022

Sector	Low SEA Qtr	Low Mid SEA Qtr	Upper Mid SEA Qtr	Top SEA Qtr	Bottom 2 SEA Qtrs
Government	31.7%	24.1%	22.4%	21.8%	55.8%
Non-Government	12.4%	22.5%	29.3%	35.8%	34.9%
Catholic	15.4%	27.7%	30.7%	26.2%	43.1%

² OECD (2018) *Equity in Education: Breaking Down Barriers to Social Mobility*, OECD Publishing, Paris

³ The OECD measures student disadvantage using the Index of Economic, Social and Cultural Status, which combines measures of parental occupation, parental education, and an index of home possessions. The country at the 1st ranking has the least segregation See: OECD (2019), *PISA 2018 Results (Volume II): Where All Students Can Succeed*, PISA, OECD Publishing, Paris, <https://doi.org/10.1787/b5fd1b8f-en>.

⁴ OECD (2019) *Balancing School Choice and Equity: An International Perspective Based on PISA*, PISA, OECD Publishing, Paris, p. 56.

Independent	9.4%	17.4%	28.0%	45.2%	26.8%
NSW Total	24.7%	23.5%	24.9%	26.9%	48.2%

Source: ACARA MySchool Launch 2023, ICSEA data 2022. Figures show proportion of students within the relevant school population within each quartile. Figures add to 100% horizontally.

Note: “Low SEA Qtr” indicates the students are in the most disadvantaged 25% of Australian school students, and “Top SEA Qtr” indicates the students are in the most advantaged 25% of students.

Students with complex needs are particularly affected by our segregated system. A higher proportion of priority equity cohorts are educated in government schools across Australia, including students with disability,⁵ Aboriginal and Torres Strait Islander students,⁶ students for whom English is a second language⁷ and students in rural, regional and remote areas.⁸ Many of the issues faced by these students and their families are complex, overlapping and need to be catered for within the school gate. These compounding factors are further exacerbated by access to the service systems that students and families require beyond the school gate, resulting in further downward pressure on schools and school systems.

NSW analysis shows that government comprehensive high schools (i.e. those that do not have a specialisation such as performing arts, sport or technology) often educate a larger proportion of the most disadvantaged students. These schools can experience decreasing enrolments numbers which can affect student diversity, availability of certain subjects and extra-curricular offerings and increased difficulty in a school’s ability to attract and retain staff, especially teachers who have the appropriate experience to meet the complex needs of the student cohort.

Schools serving communities experiencing high levels of socio-educational disadvantage often require a stronger focus on safety, health, wellbeing, and welfare in addition to supporting students’ learning. Conversely, schools with higher levels of advantage can more readily focus on the core business of teaching and learning because their students typically have their basic needs met at home. This is another urgent factor that intensifies and perpetuates the cycle of disadvantage.

One way that NSW seeks to address wellbeing in government schools is through the Wellbeing and Health In-reach Nurse (WHIN) Coordinator Program. The program is a partnership between NSW Health and the Department of Education and establishes a wellbeing nurse to work in selected schools to identify health and social concerns for students and their families and facilitate their access to health care. Wellbeing nurses are an additional support within schools and work as part of a whole school approach to student health and wellbeing.

NSW has sought to address the impacts of these factors by introducing additional supports for teachers and leaders, including through the development and delivery of a new program of professional learning for the HSC. HSC Professional Learning is designed to improve HSC learning outcomes for all government school students. It is a system-wide routine of professional learning that is inspiring for teachers, high-quality, fit for purpose and progressively evaluated – responsive to the analysis of data and improved using a research and evidence base.

⁵ In 2022, 23.5% of government school students across Australia received an educational adjustment due to disability, compared to 19.5% of Catholic school and 22.4% of Independent school students. Source: National Report on Schooling in Australia data portal.

⁶ In 2022, 8.1% of government school students across Australia were Aboriginal and Torres Strait Islander students, compared to 3.1% of non-government school students. Source: National Report on Schooling in Australia data portal.

⁷ In 2022, 31% of government school students across Australia had a language background other than English, compared to 26% of non-government school students. Source: 2022 My School, ACARA data access program.

⁸ In 2022, 29% of government school students across Australia attended a regional or remote school, compared to 25% of non-government school students. Source: 2022 My School, ACARA data access program.

The general aim for all actions should be an education system where disadvantaged students can reap the benefits of excellent teaching, resources, and peers. This in turn will lift social mobility and decrease disadvantage in our society.

2.1.2 The next NSRA should be sensitive to the particular challenges of supporting students with disability

Supporting students with disability should continue to be a focus of all governments. An estimated 1 in 5 (22.5% or 911,000) school students in Australia received an educational adjustment due to disability in 2022, and almost 1 in 18 students (5.4% or 206,000) have a severe or profound disability.

The number of students with additional learning and support needs across all school settings continues to grow and many have more complex needs. Capital funding remains a crucial lever to facilitate such supports, in alignment with a key recommendation from the Gonski Review. This must be considered in the next NSRA if we are to lift outcomes and create inclusive educational environments for students with disability. If we can appropriately better support students with disability through national collaboration, we will be better placed to get it right for all students and see the desired shifts in education outcomes.

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability is expected to report by 29 September 2023. Where possible, the Panel should also consider these recommendations in their work on this Review and potential interaction with the next NSRA.

2.1.3 Closing learning and attainment gaps for priority equity groups must continue to be prioritised in national targets and reforms

NSW recognises the important role that education plays in reducing the impact of disadvantage on people's lifelong outcomes. NSW remains committed to lifting outcomes for all students and in particular priority equity cohorts. The Alice Springs (Mparntwe) Declaration points to the importance of supporting equity as a hallmark of a system focused on excellence and improving students' life-long opportunity through education.

NSW acknowledges that there are other student cohorts, as identified by the Panel, who are likely to experience significant barriers that negatively impact their educational outcomes. Additional equity cohorts highlighted by the Productivity Commission in their 2023 final report on the Review of the NSRA have been identified by NSW for some time, and these cohorts continue to be supported by the Department, as system manager for government schools, through existing state-based policy and programs.

Through NSW's needs-based resource allocation model (RAM) for government schools, targeted funding is provided to support students for whom English is an additional language or dialect, and students from refugee backgrounds. The NSW out of home care change funding model provides funding for students in out of home care, to support their learning, wellbeing or access to the curriculum. The Department also operates schools at all NSW Youth Justice Centres to ensure young offenders can continue their studies and be prepared to re-enter education, training or the workforce upon leaving custody.

NSW remains committed to ensuring all students receive the support they need to succeed. As with other reforms, it will be important to consider if a national approach is the optimal pathway for action.

2.1.4 Efforts to improve outcomes for Aboriginal and Torres Strait Islander students must take a community approach

Continued consideration needs to be given to how the NSRA can help reach the goals of the National Agreement on Closing the Gap in line with each jurisdiction's Implementation Plan. Noting

the National Agreement on Closing the Gap establishes direction for both early years education in the formative years and HSC and employment outcomes at latter stages of the student journey; primary school outcomes are not distinctly defined. There is an opportunity for the NSRA to consider more generally how to align the intent of both Agreements in relation to educational socio-economic targets. It is also important to note the cross-government requirements of Closing the Gap education targets, in particular the impact of other service agencies or supports on education outcomes for Aboriginal and Torres Strait Islander students.

Acknowledging that improving equity outcomes requires a long-term approach and many learners are impacted by multiple factors, working toward community defined outcomes (in lieu of, or in company with targets) would be a more appropriate approach and considers the external factors beyond education that are impacting Aboriginal and Torres Strait Islander students.

The setting of targets is important, however, it can be challenging where there are small student numbers and limited availability of data (in all jurisdictions). There are current limitations in the ability to collect data beyond existing indicators that may not be fit for purpose and do not capture the relational aspects that impact a student's experience with education.

Any reforms or targets must be designed in genuine partnership with Aboriginal and Torres Strait Islander people and communities. In addition, any targets developed should not be comparative with the mainstream cohort of students unless these are agreed and defined by the Aboriginal and Torres Strait Islander Education Committee (ATSIEC). Comparisons are not culturally appropriate and do not meet the principles of Indigenous Data Sovereignty, as further outlined in this submission. The next NSRA is an opportunity to set culturally appropriate targets and outcomes as defined by community; in line with strength-based narratives, such as student wellbeing and strength in culture.

2.1.5 The next NSRA should be sensitive to Regional, Rural and Remote contexts and maintain flexibility for jurisdictions to tailor support according to their contexts

It is important that policy initiatives can be contextualised to better meet the diverse learning and wellbeing needs of students. The Panel should be cognisant of the varying ways in which services are delivered in different contexts and be careful not to provide one-size-fits-all solutions and recommendations. For example, in Regional, Rural and Remote (RRR) areas services can be extremely limited and this can impact the ability of schools to access support for students (e.g. allied health professionals). This also means that services may be delivered virtually, rather than face-to-face, and it is unclear what the impact of this delivery model is on student outcomes.

In addition, any proposed targets must avoid unintended consequences or reflect biases. For example, having a target for senior secondary certification may suggest that this is the only, or preferred, successful outcome of schooling. However, we know in RRR contexts this is often not the case and we should pay equal attention to other post-school pathways such as vocational education and training or employment.

NSW supports the strengthening of national policies to better support teachers and other school staff in RRR contexts. For example, exploring the opportunity for initial teacher education to have a greater focus on preparing teachers for the nuances of regional, rural and remote contexts. This could include 'Grow Your Own Teachers' and 'Support for Rural Beginners' programs that were recommended to the 2023 Teacher Education Expert Panel Review. There should also be a focus on local decision making to ensure Aboriginal and Torres Strait Islander leaders and Community-Controlled Organisations are able to inform how best to support Aboriginal and Torres Strait Islander students outside of metropolitan areas.

2.1.6 Targets should remain aspirational as all schools have not been receiving at least 100% of the SRS for a suitable period of time

NSW supports performance targets/improvement goals that recognise the different circumstances of schools and support needs-based funding. Targets should be aspirational, as applying performance hurdles to recurrent funding would undermine the needs-based national framework and cannot be consistently applied to systems receiving inconsistent levels of funding.

There is persistent inequity between school sectors and across states and territories with respect to funding compared to the national benchmark School Resourcing Standard (SRS). It is unreasonable to expect school systems that are funded below the national benchmark to achieve the same targets as systems that are funded at that level or higher. This is especially the case in the context of national staffing shortages. Any comparison of achievement against targets that does not compare 'like for like' baselines is also inherently unfair. The Panel should note that NSW is committed to funding all NSW schools and systems at 100% of the SRS by 2029, to ensure they receive the minimum funding required to meet their students' educational needs.

3 Improving student mental health and wellbeing

Student wellbeing is an enabler for improving student engagement, performance, and levels of school completion. Strategies to improve student outcomes need to focus on both academic and wellbeing practices. However, any new reforms would need to seriously consider the complex out-of-school factors that influence student wellbeing and whether the NSRA is the most appropriate vehicle to pursue such reforms.

3.1.1 There is an important link between student wellbeing and educational outcomes

The NSW Government understands the link between student wellbeing and academic results. As part of the \$400 million Education Future Fund, the NSW Government has committed to expanding the number of counsellors in schools. NSW is investigating further options to meet the diverse needs of our schools and students made available through this commitment. However, as recognised by the Panel, student wellbeing is influenced by factors that are beyond the responsibility and influence of schools.

3.1.2 While schools have a role in student wellbeing, they are not a coordination point for all services

Schools have the primary responsibility of ensuring students achieve educational excellence and are equipped for post-school opportunities. Generally, potential in-school factors impacting student wellbeing are greatly outweighed by the factors outside of schools. These include unmet demand for mental health services, financial circumstances, and other adverse childhood experiences in the home. The Schooling Resource Standard (SRS) is an estimate of the total public funding needed for a school to meet its students' educational needs. As with school transport, health and welfare were excluded from the methodology of the SRS. Realistically, schools cannot improve student wellbeing by leveraging in-school factors alone due to the number of factors outside of schools. There may be scope for greater national collaboration on in-school factors where national-level collaboration will facilitate improved wellbeing outcomes at a lower cost to individual jurisdictions and their local school. However, the Panel must consider whether the highly contextual nature of wellbeing means that local schools are best equipped to determine how to address these in-school factors, as opposed to a standardised, national implementation approach.

Although it is agreed that schools are integral to safeguarding the physical and psychological safety of students and staff, schools are not adequately (and cannot be) resourced to be the primary service point in mental health intervention. Schools understand that students achieve better educational outcomes when they feel known, valued and cared for. In supporting these aims, schools may facilitate diagnostic activities directly related to learning and development and play a frontline role in the management of behavioural issues. They may also deliver mental health and emotional wellbeing services on site (e.g. school counselling) to provide early intervention and support for students experiencing distress, including providing guidance on when students and their families require support outside the school gate. However, any initiative or measure to nationally support student wellbeing must respect that the primary role of schools is to support teaching and learning of students.

The Panel should consider the significant administrative burden teachers and schools already face before recommending they take on additional responsibilities for coordinating mental health services for their students. The department acknowledges external demands on teachers' and school leaders' time and supports maximising the time available for teaching, learning and instructional leadership. CESE's evaluation of NSW's former Local Schools Local Decisions (LSLD) program revealed that the increased administrative burden of the program negatively impacted schools. Therefore, potential wellbeing reforms need to consider whether schools are the most appropriate place to address out-of-school factors influencing student wellbeing.

3.1.3 Reforms need to acknowledge the challenges of addressing wellbeing in schools

Currently, there is not a consistent understanding of wellbeing across jurisdictions, making it difficult to speak in like terms and agree to a shared action or outcome. Significant preparatory work is needed before jurisdictions could reach agreement on a national strategy to address student wellbeing. The first step could be to determine agreed principles to guide jurisdictions and provide clarity on the scope of the issue. However, given this is a challenging task considering the breadth of contexts that exist across Australia, a firm rationale for developing a national strategy must first be agreed by governments.

Work in this space must acknowledge that the meaning of and strategies to address student wellbeing are context dependent, based on varying locations, cultures, needs and the service offerings available. Differing worldviews may impact what wellbeing means to different cohorts; for example, Aboriginal and Torres Strait Islander students, families and communities perceive wellbeing, and what constitutes wellbeing, differently to a western understanding. Therefore, wellbeing supports should be informed by and tailored to the community they are catering for. For example, supports for Aboriginal and Torres Strait Islander students must be personalised, trusted and culturally responsive.

Another key consideration must be the administrative impact on teachers. Any initiative that relies on further tracking or training risks creating additional teacher workload, which may ultimately be counterproductive. Teachers and staff are under increasing pressure to support student wellbeing and other student needs alongside finding time for teaching and learning. If a national approach to wellbeing is established, it must help students without burdening teachers.

Student wellbeing and mental health are highly sensitive topics and need to be treated accordingly, with consideration to the views of students themselves. Student privacy needs to be prioritised, especially in any related data reform work to support student wellbeing. Stigmatisation of mental health and wellbeing-related issues may also impact the uptake of services by students and/or their families, and this needs to be considered in the design of wellbeing initiatives.

3.1.4 Any initiatives should focus on inclusive education, belonging and student voice as integral school-based contributors to student wellbeing

Schools offer an environment where students can feel cared for, respected, and valued by peers and other members of the school community. Schools provide opportunities for students to thrive in a culture of connectedness and acceptance. As indicated by the Panel, these school-based contributors to wellbeing, collectively referred to as a 'sense of inclusion and belonging', are the wellbeing factors where the NSRA could focus.

Inclusive education in NSW is defined as: "all students, regardless of disability, ethnicity, socio-economic status, nationality, language, gender, sexual orientation or faith, can access and fully participate in learning, alongside their similar aged peers, supported by reasonable adjustments and

teaching strategies tailored to meet their individual needs.”⁹ In practice, an inclusive education environment is one that adapts the design and physical structures, teaching methods, and curriculum as well as their culture, policy and practice so that all students can participate in education in a psychologically and culturally safe way, without discrimination.

Belonging is related to students’ academic outcomes. As well as an important outcome in its own right, research (including from AERO¹⁰ and CESE¹¹) shows that aspects of belonging at school, such as positive relationships to peers, are associated with improved academic outcomes for students.

Student voice is students actively participating in decision-making at school on issues that shape their education experience. To be successful, schools must create a culture that values the perspectives and opinions of students and act on them.

These elements should be contemplated when considering potential initiatives aimed at addressing student wellbeing as they are able to be achieved within the school gate.

3.1.5 Wellbeing initiatives must be adaptable to different needs in different contexts and allow for fluctuations in impact, based on a range of factors

As with all National Policy Initiatives (NPIs), any proposed wellbeing approach should be a national commitment with flexibility for states and territories to design and deliver local solutions and track outcomes via their own wellbeing frameworks. Flexible approaches are required to ensure that priority cohorts in particular areas are receiving the assistance they need.

This localisation would nevertheless benefit from the Commonwealth’s policy levers, particularly in sectors outside of the education system. For example, work to address student wellbeing in schools could include Commonwealth actions to expand the child psychologist workforce and expand access to Primary Health Networks in regional, rural and remote communities.

3.1.6 Existing measures and initiatives in NSW and nationally should be leveraged where appropriate

A range of initiatives to boost student wellbeing are underway in NSW and nationally. When considering any additional national work in this space, existing national, state and territory initiatives should be examined to ensure that further efforts are addressing gaps and not duplicating effort. This also provides opportunities for existing initiatives that have proven impacts to be expanded for national use. As with all NPIs, any national initiatives must target issues that benefit from cross-jurisdictional collaboration and avoid seeking unnecessary uniformity.

NSW is refreshing the wellbeing framework for government schools and including a stronger focus on wellbeing in the newest version of the School Excellence Framework. This will support government schools to develop a more practical understanding of how wellbeing can be proactively planned for, implemented, and evaluated and support a common understanding of wellbeing through developing wellbeing literacy. Progress is currently tracked for government school students in Years 4 to 12 through measures from the optional Tell Them From Me (TTFM) student survey.

Nationally, there has been significant work and research underway across the period of the current agreement. There is potential to build upon work including;

⁹ Department of Education, 2019, *Inclusive Education Statement for students with disability*, Page 1

¹⁰ AERO (2023), Encouraging a sense of belonging and connectedness in primary schools (Guide for Teachers)

¹¹ CESE (2020), Supporting students’ sense of belonging – Every student is known, valued and cared for in our schools, NSW Department of Education

- the findings from the National Student Wellbeing Project, pursued through the current NSRA under NPI C (iii), improving national data quality
- the National Public Education Wellbeing Summit, which seeks to consider how system capacity can be built to enhance the wellbeing of Australia's children in the public education system
- the National Student Wellbeing Program (previously the National School Chaplaincy Program), which distributes Commonwealth funds to a limited number of schools based on need to hire chaplains or student wellbeing officers
- work underway by the Australian Education Research Organisation (AERO) after being tasked by Ministers to investigate and explain the decline in student attendance and suggest evidence-based approaches that may assist in reversing the trend. The findings from this could help to provide an avenue to assist wellbeing through a focus that is within scope for schools.

Evaluation of these current initiatives is necessary to ensure that future work is targeted and provides support that students and school systems need.

3.1.7 Existing data on attendance can be used as a proxy for wellbeing

Further evidence on the benefits of a nationally consistent wellbeing measure is needed before this should be considered for inclusion in the next NSRA, particularly given the complexities in measuring wellbeing and the need for clarity on national relevance and policy for national action.

While a national measure has potential to improve reporting and ongoing evaluation of wellbeing services in schools, it must also consider the conceptual complexity of wellbeing as a psycho-social indicator.

Many factors which affect student performance and wellbeing cannot be measured easily.

There are also risks including increasing the burden on schools to collect data, and data being used to produce 'league tables', whereby schools are implicitly (and unfairly) judged as the sole contributor to their student populations' wellbeing.

In addition, student privacy needs to be prioritised in any consideration of data collection or measurement to prevent linking wellbeing data to individuals and comparison between students.

To address these concerns, NSW proposes attendance data as an indicator for student engagement in the next NSRA. If students feel included and that they belong and have a voice, they will typically attend school. It is also not a point in time measure, but shows continued engagement. However, before attendance data is used for this purpose, all jurisdictions will need to agree required refinements and data use limitations. For example, the current attendance data does not delineate the reasons for school absences (e.g. cultural reasons), which would impact how the data could be used to assess engagement. Also, such data may not be fully available due to student privacy concerns.

NSW supports further national work to progress a shared understanding of wellbeing and the efficacy of student wellbeing measures. The AERO would be best placed to lead this work in partnership with all jurisdictions.

4 Our current and future teachers

A stable supply of quality teachers is essential for improving student outcomes. Teacher attraction and retention, particularly in specialty subjects and non-metropolitan areas are a significant challenge for both government and non-government schools. The factors that influence teacher attraction and retention are complex and multifaceted and the next NSRA is an opportunity to use national levers to help address these issues.

4.1.1 NSW is working to address workforce shortages

The NSW Government is committed to providing a stable and secure workforce which will lead to better educational outcomes in the classroom through a range of initiatives, including:

- entering new discussions with unions on teacher pay and conditions
- investing in the Education Future Fund to increase funding to hire more teachers
- offering 16,000 temporary teachers and school-based support staff in government schools conversion to permanent employment by the beginning of Term 4, 2023
- trial of School Administrative and Support staff administrative supplement to relieve the administration workload of teachers
- undertaking an audit of teachers' administrative tasks with the aim of reducing this by five hours per week. NSW have already made significant cuts to the number of policy and process changes to be implemented by schools to enhance working conditions and workload pressures.
- increasing the pipeline of teachers into NSW public schools through expansion of the Professional Experience Hub Schools Program, the \$20 million Innovative Teacher Training Fund and programs to expand flexible Master of Teaching courses for career-changers
- supporting work nationally through the National Teacher Workforce Action Plan and supporting in principle the recommendations from the Teacher Education Expert Panel.

4.1.2 Future national initiatives should build on existing programs by complementing their activities, addressing their limitations or implementing their findings

Much national work has commenced in recent years regarding the teacher workforce. Two initiatives of note are the National Teacher Workforce Action Plan (NTWAP) and the work of the Teacher Education Expert Panel (TEEP).

The NTWAP has been a model for national collaboration to address teacher workforce issues and the TEEP has recently provided recommendations to better support Initial Teacher Education (ITE) students and beginning teachers.

The Panel should consider what the next agreement could do to complement the NTWAP actions and TEEP recommendations, rather than duplicate them. It should be noted that the next NSRA is likely to remain beyond the end date of the NTWAP, and therefore it should look to build on initiatives beyond existing NTWAP initiatives. Success of any such reforms will be heavily influenced by the flexibility afforded to jurisdictions to implement them according to local context.

The Panel should consider teaching quality as a driver of student outcomes, given that it the biggest in-school influence on student achievement. The NSW Government will continue to strengthen the quality of teaching across NSW schools by providing high-impact professional learning, and consistent performance and development processes in priority areas. Professional learning programs such as the HSC Strategy embed equity into their design to strengthen teaching practice, and are accessible to teachers in all contexts, regardless of postcode. Each program is underpinned by rigorous and responsive evaluation, which guides refinements of the programs to improve their impact on teaching quality

4.1.3 Efforts to attract and retain teachers should focus on need, diversity and location

The significant diversity of learners across Australia requires an equally diverse teaching workforce. Diversity is a crucial element in schools which can promote social cohesion, broaden perspectives, challenge assumptions, and foster greater belonging and inclusivity. Beyond cultural identity and language, there are other considerations to improve diversity across the teaching workforce to better meet the needs of learners.

A key consideration when attracting prospective teachers should be geographic location. For example, the methods for attracting teachers to regional, rural and remote (RRR) opportunities will differ depending on whether metropolitan or RRR audiences are targeted.

While Teacher supply is a national issue, the effects are felt acutely in RRR areas, where there is also a high incidence of out-of-field teaching due to necessity. Providing high-quality professional development opportunities for teachers in RRR areas can help address subject-specific shortages (such as in science, mathematics, special/inclusive education, and design and technology), while also helping teachers stay up to date with the latest research, trends, and best practices in education – making their work more rewarding. These opportunities need to respond to the different needs across RRR areas. Addressing infrastructure challenges, such as housing, transport, and internet connectivity, can help make it more feasible for teachers to work in RRR areas. Partnering with local communities to support and promote education can also help make teaching in RRR areas more attractive and rewarding. In addition, supporting teachers beginning their careers in RRR areas is important. There is a strong link between remoteness and likelihood of early career teachers' intentions to leave the profession. Early career teachers in more remote locations are more likely to leave the profession, whilst their peers in metropolitan locations are least likely to leave. High quality induction and mentoring programs, access to in-person professional development and the release time available to access these supports can have dramatic effects on the transition process, enhance effectiveness and wellbeing, and promote retention of early career teachers in RRR locations.

Greater financial assistance may alleviate some difficulties faced by tertiary students.. The Commonwealth's commitments through NTWAP provide a base from which to further expand.

There is also a need to consider the context of our broader teaching workforce and to ensure that efforts to attract and retain teachers in our schools do not exacerbate workforce challenges in the early childhood education sector. Early childhood teachers play a critical role in supporting children to start school ready to learn, particularly for those children who are experiencing disadvantage.

4.1.4 Nationally, we should increase support for Aboriginal and Torres Strait Islander peoples to participate in education as teachers and school leaders

Workload pressures are often higher on Aboriginal and Torres Strait Islander staff and teachers who often carry an additional 'cultural load', and hold dual roles in schools and their broader community. They are generally the trusted advisor about all things schooling for students and families that may

not be engaging with schools and the school community. Further, schools often rely on Aboriginal and Torres Strait Islander teachers and staff to facilitate relationships with families and communities, and to support the professional development of colleagues, curriculum implementation, and other school programs and initiatives. For example in 2023, NSW launched a pilot program to support School Learning Support Officers (SLSOs) in government schools to train as teachers, with a focus on rural, regional and high-demand metropolitan areas. Given the success of this pilot, the Grow Your Own - Teacher Training Program will expand for the 2024 intake to also support permanent or long-term temporary Aboriginal Education Officers (AEOs), School Administration Officers (SAOs), School Administrative Managers (SAMs) and Business Managers (BMs) to train as teachers.

There is a role for the NSRA in promoting and attracting more Aboriginal and Torres Strait Islander people to the teaching profession and providing the right supports to address low rates of retention.

Changes could also be made to ITE to give non-Aboriginal and Torres Strait Islander teachers a better understanding of how to work effectively with Aboriginal and Torres Strait Islander colleagues and communities. National campaigns that promote teaching should aim to recruit and increase representation of Aboriginal and Torres Strait Islander school staff and leaders.

There is an opportunity for the next NSRA to support newly qualified teachers by enabling and supporting them to work closely with Aboriginal and Torres Strait Islander leaders. This could be achieved through the new ATSIEC and its peak bodies. This will foster the development of culturally relevant skills, lead to culturally responsive school environments and support the intentions of Closing the Gap priority reform two – building the community-controlled sector.

4.1.5 National commitments to teacher workload reduction should be more ambitious

The NSW Government has publicly committed to reducing the workload of teaching staff by five hours per week and is pioneering a range of other workload reduction initiatives. In Term 1 of 2023, 130 NSW government schools identified and tested several ways to provide immediate relief for workload pressures. These include workload simplification processes, work decommissioning kits, and alleviating teachers of non-teaching work by boosting our school administration and support workforce. Further interventions will occur over the next two years, including a line-by-line audit of all administrative tasks teachers are required to do. This will look at ways to remove, simplify or digitise tasks, with a focus on culling administration that does not benefit student outcomes.

In April 2023, the NSW Government announced the halving of more than 70 mandated changes to policies and processes that were due to roll out in Term 2. Only those policies that are essential and have minimal impact on frontline teachers remain. There will also be a pause and review of all pilots and programs that started in Term 2 and teachers will be consulted on which will continue.

The Panel should consider how efforts to reduce teacher workload could be elevated to the national level through the NSRA and must ensure that the Teacher Workload Impact Assessment tool being developed under the NTWAP is an effective measure, supported by input from the teaching profession. It is critical that any new national initiatives do not lead to unnecessary additional workload for teachers, leaders and schools.

4.1.6 Recognising more highly skilled teachers will help teacher retention and support

Highly skilled teachers have a key role to play as mentors to ITE students and early career teachers to guide, advise and lead them in effective teaching to improve student learning. Their positive impact by supporting other teacher colleagues should not be underestimated. HALT accreditation recognises the contribution of expert teachers to contribute to their colleagues' learning and

improve teaching practice. NSW is working to attract more teachers to apply for HALT accreditation to achieve the national target of 10,000 HALTs by 2025.

In May 2022 NSW introduced a new process to streamline applications through a modular application process.

NSW is further reviewing the HALT Accreditation Policy in response to AITSL's new national framework for Highly Accomplished and Lead Teacher (HALT) accreditation approved by Education Ministers in July 2023. NSW is continuing to identify ways to significantly reduce the administrative workload on applicants and principals/service directors and create flexible and streamlined pathways to support existing and aspiring applicants to achieve HALT accreditation.

4.1.7 The next NSRA should act as a platform for national solutions to workforce issues

A policy initiative of the current NSRA is the review of teacher workforce needs. This has produced two documents, described as 'narratives': *National Initiatives to Support Teaching and School Leadership* and *Teaching Futures: A National Teacher Workforce Strategy for Australia*. These mainly seek to promote national collaboration through a shared understanding of workforce problems. There is a need to move beyond 'narratives' towards concrete policy solutions.

Despite this, the design of the NSRA should not include commitments that compromise the ability of each employer and jurisdiction to take actions appropriate to their own contexts. Instead of identical approaches, the next NSRA could support further collaboration on solutions that can be tailored to jurisdictional contexts, recognising state and territory responsibility for service delivery.

All jurisdictions should be expected to make commitments. For example, the Commonwealth should investigate how it can drive equity between sectors and across states and territories, using its initial teacher education and tax levers. This includes exemptions on fringe benefits tax which are available for non-government school employees but not government school employees.

5 Collecting data to inform decision-making and boost student outcomes

Data collection is an integral part of the Australian education system, providing valuable insights into student outcomes, school performance, and current and future education needs. While existing data collection procedures are robust, there is still an opportunity to improve data collection, national collaboration and consistency.

5.1.1 Data collection should adopt the principle of single provision, multiple use, where possible

Clause D9(e) of the National Health Reform Agreement stipulates data procedures should have the principle of single provision, multiple use. This should be generalised to all data processes. Data collection should leverage existing data assets to find insights to new problems.

The NSW Data Analytics Centre (DAC) and NSW Better Outcomes Lab (BOL) extend this approach with a 'build once, use often' model that enables safe data sharing, hosting, access and use of strategic and integrated data assets and insights. Providing central capability for NSW's participation in a national approach to strategic and integrated data, the DAC and BOL support a better understanding of service systems, including evaluating what works.

The Panel should consider how the Commonwealth's linked datasets could be used to inform education policy at the state and territory level. In particular, leveraging the re-usable systems and processes being developed through the National Disability Data Asset (NDDA) and Australian National Data Integration Infrastructure should be considered.

Any data collection request must also recognise the varied ability across Australia to collect and input data and avoid duplication of effort.

National health system activity and cost data could serve as an example for the design, development, implementation and evaluation of other nationally linked datasets to inform education policy.

5.1.2 Establish a catalogue of education data to enhance decision-making and inform policy

A lack of jurisdictional consistency in definitions, parameters and methodologies in education data collection hampers our ability to draw credible and robust national insights and make informed policy decisions to boost student outcomes nationally.

The Panel should consider recommending the establishment of a national catalogue of existing education data assets and have an agreed national metadata standard (leveraging our current data assets). The catalogue could include publicly held data and certain non-public data that can be shared upon request (subject to confidentiality restrictions) should that data be of legitimate benefit.

There may be a case for national consistency around certain data. Identifying these data requires further research and consultation. However, NSW stresses that the case for national consistency must be strong and must not lead to further administrative burden for teachers. It should also be noted that national consistency does not necessarily mean that national data should be housed in

one place. The location, and owner of data collected at the state level should always be carefully considered.

The expertise of teachers and school leaders should not be overlooked when determining the credibility and usefulness of the types of data used to inform education policy.

5.1.3 Indigenous Data Sovereignty must be formally embedded in policy

Indigenous Data Sovereignty (IDS) is rooted in the principle of self-determination and refers to the right of Indigenous Peoples to exercise ownership over their data. Ownership of data can be expressed through the creation, collection, access, analysis, interpretation, management, dissemination and use of this data. Indigenous Data Governance (IDG) refers to the right of Indigenous Peoples to autonomously decide what, how and why their data are collected, accessed and used. It ensures that data on or about Indigenous Peoples reflects their priorities, values, cultures, worldviews and diversity.

The NSW Department of Education is committed to improving how it shares data with Aboriginal and Torres Strait Islander people and communities and has entered a strategic partnership led by the Premier's Department to support Closing the Gap Priority Reform 4. This is a multi-year, multi-agency program that is aimed at providing specific, local level data to Aboriginal and Torres Strait Islander communities and Aboriginal and Torres Strait Islander-led organisations to drive local level decision making and to support self-determination principles.

Priority Reform Area 4 of Closing the Gap specifies the conditions under which data on Aboriginal and Torres Strait Islander communities are to be collected and used and should be reflected in any future agreement on data collection and use.

The Department is also embarking on a refresh of its overall model for enterprise-wide data governance. As part of this refresh, we will be working with the NSW Aboriginal Education Consultation Group (AECG) to incorporate IDS principles as a key part of our data governance refresh. This means increasing the transparency of our data holdings and improving the ability of our Aboriginal and Torres Strait Islander partners and Community-Controlled Organisations to access and control their data.

Presently, state and national legislative and policy settings conflict with principles of IDS. Significant work is required to address this issue. Suggested short term activities to support IDS through the next NSRA include:

- Strong engagement and consultation with existing Aboriginal and Torres Strait Islander representative groups (such as the national Coalition of Peaks, NSW AECG & NSW Coalition of Aboriginal Peak Organisations (CAPO))
- Promotion of strength-based narratives across all reporting and analysis
- Increased transparency on current data holdings so that Aboriginal and Torres Strait Islander people and communities have visibility of the data that is held and is used to make decision that impact them.
- The Panel should consider synergies with the Productivity Commission's Review of the National Agreement on Closing the Gap and collaborate with relevant partners to effectively and appropriately implement objectives in relation to IDS in the education sector.

5.1.4 NSW supports strategically sharing data and insights where a clear purpose is identified and any costs and risks are mitigated

Data collected in and around schools is incredibly important to provide a robust evidence base for operational and policy decisions. Schools are rich environments, and there are many data points that could be collected at different levels of granularity.

All data collection must have a clear purpose and have a clear benefit that outweighs the burden of collecting the data. In recent years, NSW has declined requests for further data collection (for example via surveys) in government schools. In these instances, the requests have been complex and would represent a significant workload for schools and the department.

5.1.5 Progress made against National Policy Initiatives from the current NSRA should be used to ensure the potential benefits of those initiatives are realised

The Australian Education Research Organisation (AERO) and the Unique Student Identifier (USI) should continue, to ensure that the investment in these initiatives provides the intended supports to students and school systems across Australia. Continued support for these initiatives will allow them to contribute to improving the availability of quality data.

AERO has significant potential to build and house a national evidence base for schools and education policy makers. To achieve this, AERO needs time to mature and ongoing support to develop this evidence base and become a trusted source for teachers, students, parents and governments.

Given AERO is accountable to all jurisdictions, there is potential for all jurisdictions to commission research or evidence outputs that their respective research bodies could utilise and filter into schools and system users. In addition, future research by AERO needs to be cognisant of the different contexts outside of metropolitan locations, to allow for maximum use of the research by schools.

NSW also supports continued work on the USI as it will generate insights to inform policy. Once implemented, the USI can help to:

- Understand student educational outcomes and growth
- Support students as they move through different school levels and post-school pathways
- Prevent students from disappearing from the education system if they leave school without enrolling in an alternative
- Understand the movements between school sectors

6 Funding transparency and accountability

Accountability and transparency mechanisms are important for ensuring funds are well spent. Most importantly, they ensure that needs-based funding is supporting our most disadvantaged students. Some options proposed in the Consultation Paper are concerning as they extend both the scope of accountability and the reporting requirements beyond the *Australian Education Act (2013)* (Cth).

6.1.1 The Panel should note the rigorous accountability mechanisms already in place

There are already a range of state and national mechanisms that hold governments accountable and make school and student performance transparent.

NSW has strong accountability structures in place for its consolidated educational expenditure. The NSW Minister for Education and Early Learning, and by extension NSW government schools, are accountable to the NSW Parliament and Auditor-General for all school related expenditure. NSW also meets all reporting requirements on Commonwealth funding under the *Australian Education Act 2013* and associated regulations.

NSW publishes an annual report with financial statements on its expenditures on government and non-government schools. Annual reports for individual NSW government schools also articulate how needs-based funding is utilised to support students.

Non-government schools in NSW are also subject to a range of accountability requirements, designed to be consistent with Commonwealth arrangements, including:

- systems reporting on school allocations
- a requirement to submit an annual auditor’s certification that the financial assistance provided to non-government schools has been spent in accordance with acceptable use requirements
- a range of data protocols and reporting requirements outlined in Appendix B and C of the MOU to Strengthen Accountability for Non-Government Schools.

Additionally, under s.83C of the *Education Act 1990* (NSW), non-government schools that receive financial assistance from the NSW Government in respect of non-government school children have an ongoing obligation to the State of NSW to not operate for profit. These “not for profit requirements” of the *Education Act 1990* (NSW) seek to ensure that the financial assistance provided to non-government schools is used appropriately for the operation of the school, including the education of students.

6.1.2 Systems should retain the current level of flexibility to distribute recurrent funding according to school and student need

System managers, such as the NSW Department of Education, understand their schools, students, and the local context. As recommended by the first Gonski review, system managers require a high degree of flexibility and autonomy to make funding decisions that meet the needs of their complex and diverse school systems. The role of State and Territory Governments as majority funders of the government school sector should be recognised. In line with the principle of subsidiarity, powers and decision making should be left to the lowest level of government practicable to enable customised services to suit local contexts and student need.

6.1.3 Funding transparency should consider that it's the totality of funding that provides educational outcomes

Calls for transparency often seek to attribute outcomes to specific line items of funding or individual policy initiatives. However, in practice, funding from a variety of streams is pooled and allocated to initiatives that work together to address the complex needs of students. Assessment of the efficacy of one loading in isolation of the base and other loadings risks incorrect conclusions being drawn about the effectiveness or otherwise of particular loadings.

Funding transparency should not be an attempt to link only certain funding components to an outcome, particularly if seeking to link back to the specific formula of the SRS. Recognising that the SRS is an estimate of the public funding a school needs, the *Australian Education Act 2013* (Cth) provides systems with the flexibility to apply their own needs-based funding model, as NSW does in government schools through the Resource Allocation Model. This allows systems, where they choose, to tailor system-level and school-level support and resourcing to schools and students.

6.1.4 Educational goals and programs should account for state contexts and local decision-making

National uniformity and consistency should not be the primary goal for the next NSRA and the panel should recognise the role of states and territories which operate and best understand their education systems.

In NSW this is guided by NSW's Centre for Educational Statistics and Evaluation (CESE), which undertakes in-depth analysis of education programs and outcomes to inform evidence-based decision making. The benefit of moving to a national approach should always be assessed against the costs, expected impact, and workload associated with change.

NSW highlights the difficulty of attributing educational outcomes to specific programs given programs run concurrently and there are differences in the educational needs of each jurisdiction. NSW does not support prescriptive implementation plans for reforms or making funding contingent on the achievement of outcomes and performance.

Global research has shown that it can take up to a decade to realise the full impact of large-scale policy initiatives in education, meaning that results are likely to take longer than the life of a single agreement. Consequently, a lack of immediate, observable outcomes at the state and territory level does not provide the rationale for the Commonwealth to impose rigid national approaches to achieve uniform results.

The next NSRA should set national strategic directions and facilitate national collaboration and sharing, while maximising state flexibility and innovation.

6.1.5 The next NSRA needs fewer and more focused National Policy Initiatives

The current NSRA contains eight National Policy Initiatives (NPIs). Given parties to the NSRA have not been able to complete all these NPIs within the timeline of the original agreement, there is a need for a new national collaboration paradigm to achieve the best results for students. NSW supports the Productivity Commission's recommendation that the NSRA should focus on a smaller number of targeted NPIs that meet a two-part test. Any proposed initiatives must:

1. have the most value at the national, rather than state/local, level and
2. be better administered through a coordinated national approach.

6.1.6 Accountability and transparency reforms should bolster a mutual commitment to improving education

There must not be a disproportionate focus on compliance as opposed to achieving the intended outcomes. Considering the constitutional role of the Commonwealth Government, a requirement to report to the Commonwealth should not disproportionately impact the much broader and larger concerns of operating school education systems or distract from a focus on lifting student outcomes. Rather, accountability should bolster mutual commitment between governments. This must include the Commonwealth, which can activate relevant federal funding and policy levers to support state and territory initiatives on key issues.

Transparency should not only meet the needs of public policy decision makers and governments. Research shows that engaging parents and carers in their child's education at school leads to better educational and wellbeing outcomes. Strong partnerships are created when parents, carers, educators and staff work together with mutual respect and a shared understanding of what is in the best interests of the learners they support. This can be supported by being transparent with parents and carers. As a system manager, NSW is committed to building stronger partnerships across education communities, between learners, parents and carers, educators and staff, to help to foster engagement and positive learning and wellbeing outcomes.

6.1.7 Accountability measures should consider potential impact on teacher workload

NSW already has several mechanisms which provide transparency for education expenditure. At a system level, the investment of government school funding is reported in the Department of Education Annual Report which is subject to regular examination through NSW budget oversight processes. At a school level, NSW government schools publish annual financial statements and each school accounts specifically for the impact of equity funding, reflecting on these outcomes through the Strategic Improvement Planning process.

Given the breadth of accountability measures already available in NSW, reporting requirements must consider their impact on the administrative burden for teaching staff in schools. This is particularly the case for schools in regional, rural and remote NSW which are likely to have significantly fewer administrative and support staff to resource additional reporting requirements.

NSW Department of Education

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