

Review to Inform a Better and Fairer Education System

The National Catholic Education Commission (NCEC) welcomes the opportunity to make this submission in response to the *Review to Inform a Better and Fairer Education System - Consultation Paper* (the Consultation Paper).

Background

NCEC is the peak body for Catholic education in Australia and is responsible for the national coordination and representation of Catholic schools and school authorities. Our role is to ensure the needs of Catholic schools are served through funding, legislation, and policy.

Working closely with state and territory Catholic Education Commissions, NCEC advocates at the national level on behalf of the Catholic sector and the hundreds of thousands of Australian families who entrust the education of their children to our schools.

One of the most unique and valuable features of Australia's education system is the wide-ranging availability of genuine, affordable school choice which has been positively supported by Australian families and by both major political parties over successive parliaments.

Catholic education is unique in its provision and scope in the world offering a parallel, alternative system of faith-based schools alongside government. We are the largest single provider of non-government schooling and the major provider of faith-based schooling in Australia.

Catholic schools are universal in reach and open to all families who seek a Catholic education. Australia's 1,759 mostly low-fee Catholic schools educate one in five, or nearly 794,000, students and employ more than 104,000 staff. The total Gross Value Added (GVA) contribution of Catholic education to the Australian economy is estimated to be approximately \$12.7 billion.¹ This represents more than 17% of the school education sector per year.

The mission of Catholic education, since its inception, has been to serve students from a range of socioeconomic backgrounds, particularly the disadvantaged and marginalised. Our schools welcome students from a range of backgrounds including an increase in Aboriginal and Torres Strait Islander students (up almost 63% in the last ten years). Students with disability represent almost 21% of Catholic school enrolment, and 42% of students experience socio-educational disadvantage. Almost 40% of Catholic schools are in regional and remote areas.

NCEC works to foster a thriving Catholic education sector that offers parents a choice of, and affordable access to, faith-based education for their children that is consistent with Catholic beliefs, values, and teachings. Catholic education also continues to advocate for fair and inclusive funding that sustains both government and accessible faith-based schools across Australia.

Catholic schools make a significant contribution to the educational, moral, and social fabric of this nation. Over 200 years, Catholic schools have educated millions of Australian children. Catholic school alumni have gone on to make substantial contributions in civic life, in business, in the Church, in community leadership, in social outreach, and among other arenas of public and private life.

Catholic school families, many of whom have a long and multi-generational involvement in our communities, continue to choose a Catholic education because it aligns with their beliefs and values.

¹ Estimation based on 2019 Ernst & Young analysis of Catholic Education Western Australia.

The sustained growth of our school communities shows the great importance, and the sacrifice Catholic school families continue to make to choose a school that meets the educational needs of their children and one that reflects their faith and values.

Our schools are committed to educational excellence and are underpinned by charisms of prayer, witness, catechesis, social justice, and pastoral care. Providing learning opportunities for students, staff, and parents to nurture and display these qualities in service of others plays a crucial role in the educational, service, and faith formation provided by Catholic schools.

Introduction

The current review

The *Review to Inform a Better and Fairer Education System* was launched on 29 March 2023 following the appointment of an Expert Panel in December 2022. The Review is intended to advise Education Ministers on what reform priorities should be included in the next National School Reform Agreement (NSRA).

The NSRA is a joint agreement between the Commonwealth, states, and territories to lift student outcomes across Australian schools. Reflecting the long-standing practice of collaboration between all governments to deliver school education, the current NSRA, established in 2018, sets out eight national policy initiatives against three reform directions that all parties agreed to implement over 5 years to December 2023.

The current NSRA was reviewed by the Productivity Commission during 2022. NCEC made an initial submission to the Productivity Commission in response to the *Call for submissions* Paper and again in response to the release of the interim report on 14 September 2022. The Productivity Commission's Final report was delivered to the Australian Government on 23 December 2022 and publicly released on 20 January 2023.

While the current NSRA was due to conclude in 2023, it was extended to December 2024 to allow sufficient time for the negotiation of the next agreement.

The Consultation Paper

The Consultation Paper is structured around the five key areas, derived from the review's Terms of Reference, on which the Expert Panel has been tasked with delivering recommendations for reform:

- Improving student outcomes – including for students most at risk of falling behind
- Improving student mental health and wellbeing
- Our current and future teachers
- Collecting data to inform decision-making and boost student outcomes
- Funding transparency and accountability

Discussion of each key area in the Consultation Paper is followed by a range of targeted questions.

NCEC does not intend to address all of the 37 questions raised in the Consultation Paper. Rather, this submission, which has been developed in consultation with state and territory Catholic Education Commissions, identifies and responds to significant themes from each key area.

NCEC welcomes the emphasis in the Consultation Paper of the importance of the Expert Panel hearing from a variety of perspectives on the issues and opportunities that should be prioritised in the next NSRA. NCEC acknowledges the role that the NSRA Ministerial Reference Group will play as a source of

diverse advice and a sounding board for the Expert Panel. Representatives from NCEC and other Catholic education organisations have been appointed to the Ministerial Reference Group.

NCEC strongly supports the Consultation Paper's statements that education transforms lives, that Australia's education system is a complex area of public policy which requires national cooperation, and that education requires evidence-informed policies, reforms, and classroom practices to meet the needs of students and communities.

NSRA bilateral agreements

It is important to highlight, as noted above, that the parties to the NSRA are the Commonwealth, states, and territories. Each state and territory government negotiates and signs a bilateral agreement with the Australian Government that sets out jurisdiction-specific actions to improve student outcomes and minimum required funding contributions as a condition of receiving Commonwealth funding.

While Part 6 of the current NSRA outlines the role of the non-government sector under the agreement, Catholic systems and schools are bound by the bilateral agreement agreed by their state or territory without being a signatory to the agreement.

While state and territory governments at times consult with and include Catholic systems and schools as part of the negotiation process, there can be a significant variation in the contribution Catholic authorities are able to make as part of this process. In some circumstances the jurisdiction may sign a Memorandum of Understanding (MoU) with Catholic systems to implement reforms under the NSRA bilateral agreement.²

Recommendation

NCEC recommends that such MoUs between state or territory governments and Catholic systems should be considered best practice under the next NSRA. This requirement would acknowledge that Catholic systems and schools are bound by bilateral agreements signed between their state or territory government and the Commonwealth and would be in keeping with the spirit and intent of the need for cooperation and collaboration emphasised by the Consultation Paper.

Non-Government School Reform Fund

Part 6 of the current NSRA includes a provision for the Commonwealth to provide funding to approved non-government representative bodies (NGRBs) to support non-government schools in the implementation of the NSRA. This funding is designed to recognise and support the contribution of non-government systems and schools to the national reform effort.

The Non-Government Reform Support Fund (NGRSF) currently delivers vital funding to Catholic systems in each state and territory. The NGRSF enables Catholic systems to provide essential centralised services which support Catholic schools to implement education reform priorities identified by the NSRA and bilateral agreements. NCEC supports eight Catholic NGRBs nationally, working with them to successfully implement agreed national and state-based reform initiatives to:

- support students, student learning, and achievement
- support teaching, school leadership, and school improvement
- enhance the national evidence base

² See eg, *Memorandum of Understanding to Strengthen Accountability for Non-Government Schools* between State of New South Wales and Catholic Schools NSW. Accessed 28 July 2023. https://education.nsw.gov.au/content/dam/main-education/about-us/our-people-and-structure/media/documents/Memorandum_of_Understanding_to_Strengthen_Accountability_2A.pdf

and particularly the Commonwealth's three national priorities:

- improve the quality of information on the Nationally Consistent Collection of Data on School Students with Disability (NCCD) to improve the efficiency and integrity of the data collection
- transition of NAPLAN (National Assessment Program Literacy and Numeracy) to online delivery
- improve governance and financial management practices in non-government schools to strengthen financial viability, improve business decision making and build resilience to mitigate unforeseen circumstances.

There has been a significant increase in the number of students identified as having a disability since the implementation of the new NCCD model in 2018. This is a result of teachers across schools having increased knowledge and ability to assess and identify students with disabilities using the new model. Training needs to continue to support overall consistency in the quality of NCCD data, both within jurisdictions and at a national level.

NCEC notes that the National School Resourcing Board (NSRB) recommended that the Australian Government should provide continuing support funding to ensure ongoing assistance and resources to schools for the implementation of the NCCD.³

During consultations as part of the Australian Government's 2022 evaluation of the NGSRF undertaken by McGrathNicol, all NGRBs indicated that there is an ongoing need for the NGSRF to continue beyond the current NSRA to enable the effective participation of the non-government sectors in the national reform effort. The overall conclusions of the review of the NGSRF by McGrathNicol was positive while also identifying a range of opportunities for process improvements that would enhance the efficiency and effectiveness of the program.

The essential centralised services that NGRBs are able to provide due to the NGSRF enable Catholic schools to meet their requirements under the *Australian Education Act 2013*. The ability of Catholic education authorities to continue to provide reform initiatives, activities and projects would be drastically restricted without the financial support provided through the NGSRF.

Recommendation

NCEC recommends that the next NSRA include provision for an ongoing Reform Support Fund for non-government schools over the life of the agreement to support the delivery of agreed national and state and territory school reform policy priorities.

Preliminary comments

The context of the next NSRA

Consultation and decision making for the next NSRA marks an important juncture for the education sector in Australia. The timeframe of the current NSRA has been an extremely active cycle for the education policy landscape. Throughout this period there have been ongoing education and other policy reforms and initiatives which have had significant impact on schools and systems.

In addition to this policy landscape, schools and systems have addressed substantial changes affecting broader society. For example, the COVID-19 pandemic, cost of living pressures, and significant technology advancements, such as the expansion of Artificial Intelligence, have required schools and schooling sectors to rapidly adapt to a changing education environment.

³ *Review of the loading for students with disability: Final report*, Chaney, Bradley, Brown, Craven, Daniels, Lamb, Smith & Taylor, 2019, p. 57-8.

The Consultation Paper mentions many but not all of these of these reform priorities, actions, and developments. The Consultation Paper is also clear that Australia's education system must get ready for further transformation.

Transformation for improvement is necessary and important work to ensure Australia's education system performs well for all and advances every student in every school. Further transformation of Australia's education system must adequately assess the context, successes, and failures of our current policy settings without discouraging positive initiatives currently in progress.

Many policy reforms and initiatives require further time and maturity in order to be appropriately developed and assessed. A good example is the review and reform work which has taken place in recent years about current and future teachers and the teacher workforce. The progress of, for example, the National Teacher Workforce Action Plan (NTWAP) should not be neglected or curtailed in a rush to further transformation.

Such an approach would be consistent with Finding 3.3 of the 2022 review by the Productivity Commission that:

The next intergovernmental school reform agreement should be focused on achieving outcomes, sub-outcomes and targets broadly consistent with those already agreed by governments in the National School Reform Agreement.

The Productivity Commission went on to explain that:

Many of the targets, outcomes and sub-outcomes in the NSRA remain relevant. Some modifications to improve the quality of reporting should be pursued, however this broad set of aims should continue to shape the direction of reforms in the next school reform agreement.

Recommendation

NCEC recommends that the next NSRA recognise the environment in which schools have operated over the life of the current agreement. One way the next NSRA should do this is by acknowledging and taking stock of reform initiatives that have been developed and implemented previously or are currently in progress, to ensure time for the results of the efforts to be realised, evaluated, and understood.

National cooperation, contextual strategies

As noted above, NCEC strongly supports the Consultation Paper's statements that Australia's education system is a complex area of public policy which requires national cooperation and collaboration. In setting and delivering common reform priorities and goals, NCEC also highlights the Consultation Paper's acknowledgement that achieving these goals will require "tailored responses" in recognition "that individual education systems may have needs that are unique to their schools, students and communities".

Such contextual and tailored reform priorities and actions consider the unique circumstances of schools and cohorts of students within each system and school. NCEC supports future reform initiatives that support localised work, complemented by initiatives progressed and supported at a national level where appropriate and achievable.

The Commonwealth, States, territories, and non-government sectors must work together to progress reform initiatives using the knowledge they hold over the unique circumstances of their schools, rather than an inflexible mandated approach to reform initiatives and measures without centralised support.

Recommendation

NCEC recommends that the next NSRA should recognise the shared responsibility of many stakeholders for improving student outcomes, including schools and system authorities, parents and carers, students, as well as external stakeholders such as health providers, and governments with overarching responsibility for progressing reform initiatives.

Improving student outcomes

NCEC affirms the Expert Panel's support for the Productivity Commission's description of equity and welcomes the Consultation Paper's emphasis on equity and excellence for the Australian education system.

NCEC agrees that high quality teaching and learning activities which support student outcomes, reduce or eliminate differences in outcomes across students with different backgrounds, experiences, and needs, and help all students reach their full educational, economic, and social potential is the core business of Australia's schools.

In order to support and improve learning outcomes for all their students, Catholic systems and schools are focusing on implementing evidence-based teaching practices.

For example, Catholic Education, Archdiocese of Canberra Goulburn (CECG) have implemented the *Catalyst* initiative to improve literacy outcomes. *Catalyst* is a whole-school teaching approach, supported by high quality professional learning and curriculum resources, which guides the way in which every teacher across the Archdiocese plans, delivers, and supports learning for every student.

As a further example, NCEC is currently developing a program focusing on mathematics through collaboration with a national not-for-profit organisation. The collaboration will develop evidence-based curriculum support including a shared bank of high-quality materials and teacher professional learning to drive the continual improvement of educational outcomes for all students. The intent of the collaboration is to provide support at a national, diocesan, system, and school level.

Each of these examples not only support the improvement of student learning outcomes but are also intended to have a benefit for teachers and school leaders by reducing workload.

Learning environment

The Consultation Paper rightly highlights the crucial importance of the classroom and wider school environment as a prerequisite for learning and as the basis of supporting student outcomes. NCEC firmly agrees that all students, teachers, and school leaders have a right to a safe and supportive environment in which to work and learn.

Disruption to teaching and learning has significant impact on students with the result of disadvantaging their ability to develop essential foundational skills to reach their full educational, economic, and social potential.

A common theme in recent research is that health and wellbeing concerns and their consequences are one of the main reasons for teachers and school leaders wanting to leave the profession.⁴ This work strongly suggests that the impacts, demands and experiences of disorderly classrooms have a significant negative effect on teacher safety, work satisfaction, and workforce retention.

⁴ See eg, 'Australian Teachers' Perceptions of their Work in 2022'. Longmuir, Gallo Cordoba, Phillips, Allen, & Moharami, 2022. Accessed 28 July 2023. https://www.monash.edu/data/assets/pdf_file/0008/3061169/Teachers-Perceptions-of-their-Work-2022.pdf

Research recently undertaken by Catholic School Parents Australia (CSPA) also indicates that the serious impact of disruption on student learning and wellbeing also has significant broader flow-on effects for parents and families.⁵

NCEC submits that maximising the use of evidence informed responses to manage classrooms and create positive learning environments is central to improving student outcomes, including for students at risk of falling behind.

Recommendation

NCEC recommends that the next NSRA recognise the significant impact learning environments can have on education outcomes. Consideration should be given to initiatives that target and boost positive learning environments, including through close engagement with parents, caregivers, and communities.

Outcomes that should be measured by the NSRA

The Australian Curriculum is underpinned by General Capabilities intended to support young Australians to become successful learners, confident and creative individuals, and active, informed citizens. These capabilities were agreed by all states and territories in the development of the Australian Curriculum and remain important student outcomes for Australian students. In measuring progress against targets tied to learning outcomes, targets must account for both academic performance and ongoing learning growth.

Both the Consultation Paper and the 2022 Productivity Commission's review of the current NSRA comment on learning growth and stress the importance of a focus on learning growth as critical to progress student learning and ensure no student is left behind. While measuring academic outcomes is essential for assessing students educational achievement at a given point in time, measuring learning growth is equally as important as a marker of engagement with, and development of, learning.

The collection of data to monitor student achievement and identify students at risk of falling behind is an integral part of the teaching and assessing process. NCEC acknowledges there could be benefits in implementing a nationally consistent approach to streamlining data to inform national datasets.

Under such a nationally consistent approach, baseline data must be determined in line with Recommendation 3.2 of the 2022 Productivity Commission review that the basis for measuring targets should be common to all jurisdictions and set out in the main agreement. Without establishing baseline data to measure post-intervention changes, it will be impossible to determine the success of reform initiatives.

Targets for the next NSRA should be co-designed with states and territories and progress should be measured against national benchmarks to be established from the commencement of the agreement.

NCEC contends that that no additional assessments or testing of students is necessary to support these future NSRA targets. Additional data collection would be contrary to the aims of ongoing work in reducing teacher workload initiatives through the NTWAP.

Recommendation

Rather than investing time and resources to implement additional data collection measures, NCEC recommends focusing on analysing and communicating data that is currently available or collected and

⁵ *Submission to Inquiry into disruption in Australian school classrooms*, Catholic School Parents Australia, 2023. Accessed 31 July 2023.

https://cspas.schoolzineplus.com/file/media/310/cspa_submission_to_inquiry_into_disruption_in_australian_school_classrooms_mar23.pdf

not utilised. As part of this process, teachers and school leaders will need to be supported with the time, data literacy, and evidence-informed knowledge of how to utilise this information to inform their teaching practice.

Priority equity cohorts

Drawing on findings from the 2022 Productivity Commission's review of the current NSRA, the Consultation Paper highlights the persistent challenges for particular groups of students who face historical, cultural, and systemic barriers that hinder their ability to reach their full learning potential.⁶ The review also demonstrates the disproportionate representation of particular student cohorts in underperforming groups of students.

NCEC strongly agrees that addressing the persistent challenges and barriers that these groups of students face must be a priority focus of the next NSRA. Especially important will be a renewed commitment to targets and culturally informed, respectful, and safe strategies to support First Nations Students, particularly in remote and very remote locations, and close the gap between their non-First Nation peers.

NCEC proposes that the next NSRA must also include a strong focus on the broader challenges and concerns expressed by the Productivity Commission. For example, Finding 4.4 of the review states:

The priority equity cohorts in the National School Reform Agreement do not capture many students who are at high risk of experiencing educational disadvantage,

and the explanation following Finding 4.1 describes how:

fewer than half of the students who do not meet NAPLAN minimum standards in reading or numeracy are from the National School Reform Agreement's priority equity cohorts.

As such, "the underlying causes of students falling behind cannot be wholly attributed to the barriers uniquely or disproportionately affecting students from priority equity cohorts".⁷

The complexity of this issue was also identified in the *Review of Funding for Schooling – Final Report* in 2011 which said:

The issues about underperformance in Australia are broader than low socioeconomic status and Indigenous students, with many underachieving students from middle and high socioeconomic backgrounds. Furthermore, many low socioeconomic status or Indigenous students perform well.⁸

The next NSRA must recognise the full complexity of this situation with appropriate settings and targets. While additional cohorts of students failing to achieve national minimum standards may be captured by further priority cohorts, the reform initiatives in the next NSRA must focus on improving achievement for all Australian students while providing increased focus and support for specific student groups.

Catholic Education Commissions consulted by NCEC indicated that if additional priority cohorts were to be added to the next NSRA, consideration should be given to the following groups:

- Students with English as an additional language or dialect (EAL/D)
- Students with complex trauma backgrounds (including those from a refugee background)

⁶ *Review of the National School Reform Agreement*, Productivity Commission, 2022, p. 53

⁷ *Ibid.*, p. 104

⁸ *Review of Funding for Schooling – Final Report*, Gonski, Boston, Greiner, Lawrence, Scales & Tannock, 2011, p. 168.

- Students living in out-of-home care
- Students with exceptional intelligence and talent who are recognised as unlikely to be having their educational needs met.⁹

Consideration of additional priority cohorts in the next NSRA will require thorough consultation regarding any data collection, analysis, and reporting implications for systems and schools.

Recommendation

NCEC recommends that the next NSRA must be appropriately calibrated to recognise the full complexity of the current situation regarding student outcomes and articulate appropriate settings and targets to support all students, with an increased focus for specific student groups.

Improving student mental health and wellbeing

The inclusion of a strong focus on improving student mental health and wellbeing in the next NSRA is strongly welcomed by NCEC.

NCEC was one of many Catholic education organisations and other education providers which submitted to the Productivity Commission's 2022 review of the current NSRA that student wellbeing was a significant policy gap in the agreement. NCEC proposed that the Australian Student Wellbeing Framework should form the basis of reform initiatives under this key area.

Student Wellbeing and Pastoral Care in Catholic Schools

Catholic education strongly supports initiatives which enable and strengthen student wellbeing and pastoral care services in Australian schools. Supporting young people and communities through pastoral care and wellbeing services are particularly important to Catholic schools as these services are central to the mission of Catholic education.

The provision of student wellbeing and pastoral care services in Australian schools are crucial to support young people facing challenges relating to stress, relationships, managing emotions, social media, bullying, and health and lifestyle issues. The COVID-19 pandemic has not only increased the number of students seeking support for mental health issues but also intensified the degree of the issues experienced by students.

Catholic education welcomes the recent additional funding that the Australian Government has provided to fund new and existing programs to raise awareness and provide additional support for student mental health and wellbeing. Initiatives that the government have supported, such as the Raising Healthy Children App, the scaled-up community support services provided by organisations such as Beyond Blue, Lifeline and Kids Helpline, and the National Children's Mental Health and Wellbeing Strategy will provide much needed care to students and families.

This additional assistance will compliment continuing government resources and programs which Catholic schools use to support student wellbeing and resilience, such as the National School Chaplaincy Program, the Australian Student Wellbeing Framework, and the Student Wellbeing Hub.

The importance of a partnership approach

The Consultation Paper rightly states that good mental health and wellbeing is important not only in its own right but also closely connected to greater student engagement and higher levels of academic

⁹ 'The identification of gifted underachievement: Validity evidence for the commonly used methods.' Jackson & Jung. *British Journal of Educational Psychology*, 92(3), 2022.

achievement and attainment. The objective of this key area of the next NSRA should be focused on initiatives that promote mental health and wellbeing for learning principally in the school context.

The 2023 *Measuring What Matters Statement*¹⁰ illustrates that mental health is a significant community issue which is complex and has many factors and influences. Given this background, national and jurisdictional initiatives and goals to improve student mental health and wellbeing must be developed in such a way that the context of school responsibility remains clear.

Systems, schools, teachers, and school leaders use a range of evidence-based wellbeing approaches and practices but are often limited by resourcing, the knowledge and availability of teaching staff, availability of specialist staff, and access to training to provide the school-based support students need.

Many teachers and school leaders require greater access to learning and training for evidence-based practices that support mental health and wellbeing, including trauma, challenging behaviour, and school refusal as well as their impact on learning. Training and development for teachers and school leaders on how to support their own wellbeing is also vital to ensure their ongoing capacity to provide support.

While it is important for teachers and school leaders to have capacity developed through Initial Teacher Education and professional learning in this area, schools cannot be responsible for student mental health and wellbeing in isolation from the wider contextual issues or for solving broader social problems. A holistic view of student mental health and wellbeing will recognise that while schools can be tasked with helping to improve wellbeing for student learning, measures designed to improve comprehensive individual wellbeing must reflect a balance of responsibility between parents, carers, medical professionals, and schools.

The accountability of schools will need to be balanced with appropriate responsibility on other key stakeholders and will require engagement with services, often provided by governments, outside of the education sector.

How jurisdictions, systems, and schools best integrate these broader services and implement comprehensive supports to improve student mental health and wellbeing should be negotiated, according to jurisdictional arrangements, as part of the bilateral agreements following agreement of the next NSRA.

Recommendation

NCEC recommends that the next NSRA have a focus on strong partnerships between schools and other service providers working together to improve student mental health and wellbeing.

Improving data and reporting

As the Consultation Paper acknowledges, many systems and schools already collect data to support student mental health and wellbeing using ‘a range of different approaches to defining, measuring and evaluating wellbeing.’

NCEC supports, in principle, the need for a “shared understanding of national wellbeing indicators to enable targets and outcomes to be tracked over time.” Devising and implementing initiatives to meet this need presents a significant challenge for jurisdictions, systems, and schools.

¹⁰ *Measuring What Matters Statement*, Treasury, 2023, p. 24.

Given the range of approaches currently used across systems and schools and the intent to not “reinvent the wheel”, NCEC suggests that national initiatives in this area will require strong cross jurisdictional and cross sectoral consultation to successfully progress.

Recommendation

NCEC recommends that a process of cross jurisdictional and cross sectoral consultation will be required to ensure a well-balanced set of initiatives and goals for improving data and reporting of student mental health and wellbeing.

Our current and future teachers

NCEC strongly agrees with the emphasis in the Consultation Paper regarding the importance of teachers and school leaders, that attracting and retaining teachers is a critical issue, and that the working environment for teachers and school leaders can and should be improved.

A significant amount of consultation and research into supporting the current and future teaching workforce has been undertaken over the life of the current NSRA. As acknowledged by the Consultation Paper, this work includes:

- *Next Steps: Report of the Quality Initial Teacher Education Review (2022)* and
- *Strong Beginnings: Report of the Teacher Education Expert Panel (2023)*

as well as the:

- *National Initiatives to Support Teaching and School Leadership (2020)* and
- *National Teacher Workforce Action Plan (2022)*.

NCEC made submissions and participated in consultations for each of these initiatives.¹¹

These initiatives are intended to not only support teachers, improve their working conditions, and address shortages in the teacher workforce but also focus on improving a range of other key areas and issues identified in the Consultation Paper.

Recommendation

NCEC submits that insights from the work and recommendations from current national initiatives regarding teachers and schools leaders provide a significant and strong foundation to inform the next NSRA.

Collecting data to inform decision-making and boost student outcomes

As the Consultation Paper states, the collection and publication of meaningful data is important to identify changes in student outcomes, what initiatives work or do not work, and for the transparency and accountability of governments, systems, and schools.

As the Consultation paper further notes, schools, systems, and jurisdictions already collect a significant amount of data for a variety of purposes and have extensive reporting requirements to their system, state or territory, nationally, and often internationally. The addition of a measure to evaluate and support student mental health and wellbeing, as discussed above, would be a further data collection requirement.

While the 2022 review by the Productivity Commission made it clear that reporting on measures from the current NSRA was lacking and failed to provide insight into the success of initiatives to progress

¹¹ Submissions can be accessed at <https://ncec.catholic.edu.au/>.

outcomes, NCEC contends that this weakness should not be addressed by simply requiring additional data collection and reporting requirements.

NCEC firmly agrees with the position in the Consultation paper that the next NSRA provides an opportunity to evaluate whether current data collection and reporting requirements are fit-for-purpose. Data collection for its own sake does not serve to support systems, schools, teachers, and school leaders to inform decision-making or boost student outcomes.

Rather, NCEC submits that the next NSRA should focus on initiatives to collect quality data on measures that matter, such as student growth and identification of policies and actions that work for learning, together with informed and nuanced analysis of that data. Further initiatives should aim to ensure that the analysis can be communicated and widely shared across jurisdictions, systems, and schools.

Such initiatives will require both the linkage of data identified in the Consultation Paper as well as ensuring there are consistent, standardised data collection practices. Consistent practices, what will be measured, and how it will be measured together with reporting timelines and templates should be determined before the commencement of the new NSRA to ensure collection of baseline data to inform the evaluation of policy initiatives.

Recommendation

NCEC recommends that the next NSRA should consider whether current data collection and reporting requirements are fit-for-purpose. Future initiatives should focus on collecting quality data on measures that matter, analysing that data, and communicating the analysis to inform decision-making and boost student outcomes.

Funding transparency and accountability

NCEC strongly supports the Consultation Paper's statement that funding transparency and accountability is important for students, parents, policymakers, and the community, and are integral to ensuring confidence in public expenditure. This statement reflects the Preamble of the *Australian Education Act 2013* (the Act), under which the Commonwealth provides financial assistance for schools, and that "transparency and accountability ensure public confidence in the education system and promote excellence in teaching and school leadership".

NCEC also agrees with the Consultation Paper that "a lack of transparency and accountability makes it difficult for school communities to understand their rights and needs, and ensure these are being met".

However, NCEC strongly disagrees that there is any such lack of transparency and accountability regarding public funding for Catholic systems and schools. The claim that there is not a clear picture of public funding to Catholic systems and schools is incorrect.

As the Consultation Paper outlines, under the Act Catholic systems and schools, as Approved Authorities, have legally binding requirements and responsibilities in order to, and as a condition of, receiving public funding.

The Act empowers Approved Authorities to have flexibility to allocate needs-based recurrent funding to meet educational needs and priorities. The Act requires that Catholic systems, as Approved Authorities, make their needs-based funding models publicly available and transparent. For Catholic systems, detailed information about funding models is typically published and easily accessible on their website. The principle of subsidiarity recognises that Approved Authorities have more detailed

knowledge of the needs of their students and schools than is possible to obtain from simply looking at quantitative information from national data collections.

Appendix B of the Consultation Paper lists five current methods through which Approved Authorities provide transparency as to the use of Commonwealth funding. It is important to note that while each of the listed methods provides detailed information of funding for Catholic (as well as other non-government) schools, government systems and schools do not report through all of these methods.

Furthermore, Appendix B does not include all of the methods through which Catholic systems and schools provide transparency and accountability for funding allocation and expenditure.

As with all non-government schools in receipt of Commonwealth funding, Catholic systems and schools have strict not-for-profit requirements and must provide reports to the Australian Charities and Not-for-profits Commission (ACNC) under the *Australian Charities and Not-for-profits Commission Act 2012* and the Australian Taxation Office. Many Catholic systems and schools also have organisational and business reporting obligations to the Australian Securities and Investments Commission (ASIC).

In addition to Commonwealth legislation, Catholic systems and schools must also comply with state or territory legislative, regulatory, and reporting requirements.

Recommendation

NCEC submits that Catholic systems and schools are already highly transparent and accountable to the Commonwealth as well as state and territory governments, students and parents, policymakers, and the broader community for public expenditure and other funding.

School funding is inherently complex

The Consultation Paper states that “the allocation of funds to schools in Australia remains a challenge for the public to understand”. NCEC argues that this is because school funding is an example of inherently complex public policy rather than due to lack of transparency or accountability by Catholic systems and schools.

Complexity is inevitable due to Australia’s federated model of governance and responsibility for education policy, the differing ways in which jurisdictions and systems target the varying needs of students and school communities, and that elements of funding models differ between states and territories.

Unfortunately this inherent complexity is regularly used by some to make misleading and inaccurate claims about the funding, expenditure, and transparency and accountability of Catholic systems and schools. Such distorted claims serve to undermine public understanding of school funding in Australia.

Some student-based loadings in the SRS model are not definitive indicators of need

The Consultation Paper states that “schools could be required to report to the public on how funding is used to support the students it is intended for”. This option appears based on a misunderstanding of the local and contextual accuracy and appropriateness of the SRS funding model to apply funding within schools.

Some student-based loadings in the SRS model (e.g. for First Nations students, for low socio-educational status students, for low-English proficiency students) are based on general indicators of need. They are derived from observed disadvantage from sample sizes of thousands of students. It is certainly not the case, however, that every student who attracts a loading in the SRS model requires significant extra

support.¹² Nor is it true that all students who do not attract a loading do not need additional support. As explained by the Expert Panel for the Review of Funding for Schooling in Australia:

The issues about underperformance in Australia are broader than low socioeconomic status and Indigenous students, with many underachieving students from middle and high socioeconomic backgrounds. Furthermore, many low socioeconomic status or Indigenous students perform well.¹³

The complexity of this issue was also noted in Finding 4.4 of the Productivity Commission's 2022 review of the current NSRA, which stated:

The priority equity cohorts in the National School Reform Agreement do not capture many students who are at high risk of experiencing educational disadvantage.

The review emphasised that these high risk students also include children and young people living in out-of-home care, those from a refugee and or English as an additional language or dialect background, and those in the youth justice system.

This observation can especially apply at the school-level, where sample sizes of students who attract student-based loadings in the SRS model can be small, meaning there is often variation from average population-wide trends. The students who most need additional support in a school may not directly align with the student-based loadings. This is the basis for the inclusion in the Act of the principle of subsidiarity and the flexibility for an Approved Authority to allocate and expend funding in response to local education needs.

The loading for students with disability in the SRS model is an exception to the discussion above. In order to include students in the Nationally Consistent Collection of Data (NCCD) on Students With Disability, a school *must* have evidence of providing additional support.

While it is reasonable to expect schools to allocate loadings for students with disability substantially to the students included in the NCCD, systems and schools require flexibility in order to use their funding holistically to meet local need. In keeping with the core principles of the NCCD, systems and schools must be able to retain the ability to manage their total resources to meet the learning needs of their students based on the educational expertise of their staff.¹⁴

It would also be difficult for schools to track expenditures of student-based loadings due to the estimate prices allocated for each level of adjustment, and where students attract multiple loadings. This would require complicated processes for separating out expenditures based on student characteristics and the support provided.

¹² For example, the correlation between socio-economic status and academic achievement at the student-level is quite modest (no greater than 0.3). Similarly, the Expert Panel for the Review of Funding for Schooling did not consider it necessary to provide a loading to First Nations students where the concentration of these students in a school was less than 5 per cent. Nonetheless, all First Nations students receive a loading in the SRS model.

¹³ *Review of Funding for Schooling – Final Report*, Gonski, Boston, Greiner, Lawrence, Scales & Tannock, 2011, p. 168.

¹⁴ The allocation might not fully align with the loading because students with disabilities have unique needs, the loading amounts in the SRS model are broadly calculated and the prices allocated to each level of adjustment remain estimates of need. These estimates may not match the actual additional resources required by each student with disability.

School funding models and successful education strategies

The Consultation Paper raises a concern that “there is currently insufficient visibility of funding data to effectively evaluate how funding impacts student outcomes” and information is lacking on how schools expend funding to support students.

These statements appear to suggest that more information on the funding allocated to schools by Approved Authorities, or on how schools expend the funding they receive, would enable clear links to be directly drawn between funding and student outcomes.

NCEC contends that faith in such a direct link is misplaced. School funding models do not necessarily provide meaningful insight into successful education strategies. School resourcing is mediated by a very wide range of local factors, not easily measured, that determine effectiveness in improving student outcomes. These include student and staff characteristics and capability, school leadership, infrastructure, and attitudes of school communities. While adequate resourcing is a necessary condition for success, the mediating factors are also key elements.

The most insightful information on successful education strategies is gained through rigorous evaluations of programs. These evaluations should ideally take into account all student and school factors that may contribute to outcomes, as well as the intervention undertaken, and preferably measure impact against a control group.

As outlined above, Catholic systems and schools are already required to extensively report on how funding is spent for the purpose of providing school education. Reporting of more data on school funding, including how schools expend funds, will not provide insight on how to improve educational outcomes, rather it will create more administrative costs for schools and systems.

Recommendation

NCEC submits that the existing reporting requirements for Catholic schools are sufficient and recommends that the current administrative burden of schools should not be increased by the addition of further reporting obligations.

If new reporting requirements for transparency and accountability of public funding are implemented as part of the next NSRA, NCEC strongly recommends that they must be applied on a sector-neutral basis and that reporting should include expenditure on all students who are deemed to require additional support, not just the students who attract additional loadings.

NCEC recommends that the next NSRA requires the rigorous evaluation of programs and strategies to gain insightful information of their strengths and weaknesses. NCEC supports further information being shared on evaluations of programs by education authorities.

[REDACTED]

Yours faithfully

[REDACTED]

Jacinta Collins
Executive Director

Summary of recommendations

NCEC recommends that Memoranda of Understanding between state or territory governments and Catholic systems should be considered best practice under the next NSRA. This requirement would acknowledge that Catholic systems and schools are bound by bilateral agreements signed between their state or territory government and the Commonwealth and would be in keeping with the spirit and intent of the need for cooperation and collaboration emphasised by the Consultation Paper.

NCEC recommends that the next NSRA include provision for an ongoing Reform Support Fund for non-government schools over the life of the agreement to support the delivery of agreed national and state and territory school reform policy priorities.

NCEC recommends that the next NSRA recognise the environment in which schools have operated over the life of the current agreement. One way the next NSRA should do this is by acknowledging and taking stock of reform initiatives that have been developed and implemented previously or are currently in progress, to ensure time for the results of the efforts to be realised, evaluated, and understood.

NCEC recommends that the next NSRA should recognise the shared responsibility of many stakeholders for improving student outcomes, including schools and system authorities, parents and carers, students, as well as external stakeholders such as health providers, and governments with overarching responsibility for progressing reform initiatives.

NCEC recommends that the next NSRA recognise the significant impact learning environments can have on education outcomes. Consideration should be given to initiatives that target and boost positive learning environments, including through close engagement with parents, caregivers, and communities.

Rather than investing time and resources to implement additional data collection measures, NCEC recommends focusing on analysing and communicating data that is currently available or collected and not utilised. As part of this process, teachers and school leaders will need to be supported with the time, data literacy, and evidence-informed knowledge of how to utilise this information to inform their teaching practice.

NCEC recommends that the next NSRA must be appropriately calibrated to recognise the full complexity of the current situation regarding student outcomes and articulate appropriate settings and targets to support all students, with an increased focus for specific student groups.

NCEC recommends that the next NSRA have a focus on strong partnerships between schools and other service providers working together to improve student mental health and wellbeing.

NCEC recommends that a process of cross jurisdictional and cross sectoral consultation will be required to ensure a well-balanced set of initiatives and goals for improving data and reporting of student mental health and wellbeing.

Summary of recommendations

NCEC submits that insights from the work and recommendations from current national initiatives regarding teachers and school leaders provide a significant and strong foundation to inform the next NSRA.

NCEC recommends that the next NSRA should consider whether current data collection and reporting requirements are fit-for-purpose. Future initiatives should focus on collecting quality data on measures that matter, analysing that data, and communicating the analysis to inform decision-making and boost student outcomes.

NCEC submits that Catholic systems and schools are already highly transparent and accountable to the Commonwealth as well as state and territory governments, students and parents, policymakers, and the broader community for public expenditure and other funding.

NCEC submits that the existing reporting requirements for Catholic schools are sufficient and recommends that the current administrative burden of schools should not be increased by the addition of further reporting obligations.
