



REVIEW OF THE NATIONAL SCHOOL REFORM AGREEMENT

DATE 1 JULY 2022

1. ABOUT ISA

Independent Schools Australia (ISA) is the national peak body representing the Independent school sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISA represents 1,187 schools and over 667,000 students, accounting for approximately 16 per cent of Australian school enrolments.

ISA's major role is to bring the unique needs and contributions of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

Independent schools are a diverse group of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. A number of Independent schools have been established by community groups seeking to meet particular needs or to reflect the religious values of a community. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Independent schools include:

- Schools affiliated with Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Quaker and Seventh Day Adventist schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as grammar schools in some states
- Community schools
- Indigenous community schools
- Schools that specialise in meeting the needs of students with disabilities
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other factors.

Most Independent schools are set up and governed independently on an individual school basis. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example Lutheran schools. Systemic schools account for 20 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

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2. ABOUT THIS SUBMISSION

ISA prepared this submission in response to the Productivity Commission's Review of the National School Reform Agreement. ISA has chosen not to respond to each of the 'Information Requests' questions in detail. Rather our submission responds to the Terms of Reference and provides a critique of the existing process offering advice on the nature of the NPIs, the impact of the bilateral agreements, the challenges of implementation and the measurement framework.

ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

3. INTRODUCTION

ISA acknowledges the importance of the education reform agenda outlined in the current National School Reform Agreement (NSRA) and its basis in significant work undertaken through a range of reviews, including *Through Growth to Achievement; Report of the Review to Achieve Educational Excellence in Australian Schools* (Gonski et al 2018).

ISA's submission to that review noted the sector's support for many of the measures that were subsequently adopted as National Priority Initiatives (NPIs) including the importance of formative assessment, investment to support teacher and principal capability and enhancing Australia's education evidence base.

The national reform agenda is of importance for all students, and it is essential that all governments, Commonwealth, state and territory, recognise that what fosters quality of education is equity of access and opportunity regardless of jurisdiction or sector.

Another, equally important, function of the NSRA is its role in school funding. The Independent sector strongly supports needs-based funding for all sectors of schooling. Independent schools receive most of their funding from parents - over half their recurrent funding and around 90 per cent of capital funding. The remaining funding for Independent schools comes from both governments, the majority from the Commonwealth but also from state and territory governments.

Implementation of the NPIs is a condition of Commonwealth funding to states and territories under the Australian Education Act 2013 and the bilateral agreements also set out the state and territory commitments to funding their contributions to government and non-government sectors in each state and territory. This is a critical function.

The importance of funding certainty to Independent schools cannot be overstated. As stand-alone entities, funding certainty enables schools to plan for the provision of education to their students over the long term. It is crucial that current funding relativities are maintained, and that funding continues on to be distributed on an equitable footing between sectors.

4. THE ROLE OF INDEPENDENT SCHOOLING IN AUSTRALIA

The non-government school sector, comprising the Independent and Catholic sectors, accounts for approximately one third of all school enrolments. In 2021, one in six school students and more than one in five secondary school students attended an Independent school. A comparison of 2021 data shows that the only jurisdictions or sectors that were larger than the Independent sector were the Catholic sector and NSW government schools.

Despite the significant role the non-government sector plays in educating one third of school students in Australia, neither ISA nor the National Catholic Education Commission (NCEC) has direct representation beyond the level of Schools Policy Group (SPG). The non-government sector has no direct input into the decisions made at AESOC or the Education Ministers Meeting where decisions regarding the form, objectives, targets and outcomes of the NSRA are made. The outcomes of both

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these meetings, directly impact on the non-government sector, yet the focus of state/territory departments and Ministers is strongly biased to the government sector.

Fig 1: Size of jurisdiction and sector, 2021

NSW Govt	802,182
Catholic	740,065
Independent	667,259
VIC Govt	644,238
QLD Govt	573,832
WA Govt	292,450
SA Govt	173,471
TAS Govt	55,839
ACT Govt	46,092
NT Govt	30,002

Source: ABS Schools Australia

The Independent sector wishes to ensure its views are sought and respected in the development of the NSRA and wishes to draw attention to the fact that even though the non-government sector lacks a voice at the highest levels, the Independent sector continues to make a significant contribution in advancing the National Policy Initiatives such as the Unique Student identifier (USI) and the Nationally Consistent Collection of Data on Students with Disability, where we were one of only a few who actively participated in the associated pilots.

5. THE NATIONAL POLICY INITIATIVES

ISA sees value in having clear, achievable national policy initiatives that drive national improvement and reform.

The current NSRA National Policy initiatives put forward an ambitious change agenda and while the Reform Directions are high level and strategic in nature, the NPIs themselves are fairly specific. ISA recognises there has been progress on many of the NPIs to date, however, we contend this specificity has not resulted in a national approach, nor has it led to widespread national collaboration or even a consistent achievement of NPIs. ISA does acknowledge, in the context of a pandemic, maintaining momentum and effort has been difficult.

There are two possible alternatives to the current approach that ISA suggests are considered.

The first would be for the NSRA to stay at the higher strategic level allowing for greater flexibility in implementation across the country i.e., one goal, many pathways.

Another possible approach would be to commit to a smaller number of NPIs, particularly while school systems and schools are still having to deal with the flow on impacts of the pandemic.

Whatever approach is taken, it is important to note the NSRA is not the only driver of national reform and is in fact, only the latest in a long line of national reform programs. Other initiatives, such as the National Partnerships (NPs), incentivised outcomes through the provision of reward money for the

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achievement of targets across the government and non-government sectors, which encouraged all sectors to achieve the goals of the NPs.

MENTAL HEALTH AND WELLBEING

If there were to be any additions to the National Priority Initiatives, the Independent sector would support the inclusion of mental health and wellbeing.

Students' wellbeing and mental health needs have substantially increased in number, complexity and severity particularly during the COVID-19 pandemic. All schools, including Independent schools, urgently require funding and expertise to address both the immediate and acute mental health issues individual students are experiencing and to manage student trauma and critical incidents resulting from COVID-19 and other pressures and to engage in longer term wellbeing and preventative strategies.

Research commissioned by ISA in 2021 found the following.

- There is increased incidence of mental health concerns – and at a younger age
 - Half of mental illness have onset prior to 14 years.
 - By year three, children with a mental disorder have been shown to lag academically behind their peers by 7 to 11 months. This gap increases over time.
 - Children with a mental disorder also have progressively higher rates of absenteeism over the duration of their schooling.
 - Approximately 11 per cent of children aged 12 to 17 reported deliberately harming themselves and about 7.5 per cent reported seriously considering suicide in the previous 12 months.
- Wellbeing is not distributed equally with already disadvantaged groups at greatest risk. The risk of students presenting with mental health concerns is increased if a student:
 - lives in an outer regional area.
 - lives in a low-income household or one with no employed parent or in a sole-parent household.
 - self-identifies as gender non-binary.
 - is female. (Adolescent girls in particular are more likely to experience anxiety than boys or other age).
 - is Aboriginal or Torres Strait Islander.

The ISA commissioned research also found that “schools have the potential to provide the missing prevention focus, to promote wellbeing and protect students and staff from risks to wellbeing. Evidence of the impact of mental health promotion in schools indicates that teaching students about mental health can support positive outcomes ranging from life satisfaction to academic achievement.” (ISA 2021).

6. BILATERAL AGREEMENTS

FUNDING CONTRIBUTIONS

The bilateral agreements between the Commonwealth and each of the states and territories directly impact Independent schools in terms of funding.

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The Independent sector is highly diverse however, we do know that on average, Independent schools receive most of their funding from parents, over half their recurrent funding and around 90 per cent of capital funding. The remaining funding for Independent schools comes from governments, the majority from the Commonwealth but also from state and territory governments.

In government schools it is the state and territory governments which provide the majority of school funding with the Commonwealth the minority funder.

The Australian Education Act 2013 sets out the government funding shares for the different sectors of education and the bilateral agreements are the vehicle for the achievement of those targets by state and territory governments. While not the main focus of this review, it is imperative that current funding relativities are maintained, and the funding continues on to be distributed on an equitable footing between sectors.

BILATERAL REFORM PLANS

There are also impacts on the sector through the agreed bilateral reform plans which include the Independent and Catholic sectors in each state and territory.

The bilateral reform plans vary from state to state; however, they all focus on reform activities which align with the national reform directions of the NSRA. The Independent sector supports high level objectives which are strategic and flexible to enable sectoral implementation based on local needs in both the reform directions of the NSRA and the bilateral reform plans.

7. DELIVERING THE NSRA

The cost impacts on all jurisdictions and sectors, particularly a non-systemic sector, need to be considered in setting a national reform agenda. It is clear from the Independent sector's participation in the USI Pilot for example, that implementation will create a new administrative burden on schools, particularly those with low technology. Independent schools do not have the support mechanisms that are available to schools in systems and individual schools will require significant levels of support to adopt any new initiatives.

It is not possible for the Australian Government to liaise with each individual school and collect progress data on meeting the national priorities in a meaningful way. Efficiencies are achieved in the non-government school sector through funding to non-government representative bodies which enables overarching sector support in meeting the priorities along with evaluation and measurement.

Further, the AISs, as the Independent sector's representative bodies, will need to continue to provide professional expertise and support to schools to assist in the adoption of new processes, and, at the national level, ongoing participation in consultations, working groups etc will be essential to keep national priorities and reforms a focus in the Independent sector.

The non-government sector has had access to funding to implement the Australian Government's educational priorities over three decades. This funding has been highly successful in ensuring the sector's ability to participate in and propagate national initiatives. The current Non-Government Reform Support Fund (NGRSF), which is due to cease at the end of 2023¹, also supports state and territory AISs to meet their requirements under the national and state and territory bilateral agreements and engage in and contribute to positive educational reform. The continuation of this funding will remain essential, with schools still requiring significant support to implement current Australian Government education reforms priorities and local priorities as well as to implement any new reforms

¹ The extension of this program was in the 2022-23 Federal Budget.

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8. THE MEASUREMENT FRAMEWORK

The measurement framework exists in its own right, outside the NSRA as Education Ministers' key means of reporting to the community on the outcomes of education. Management of the measurement framework has been delegated to the Australian Curriculum and Assessment Authority (ACARA) and it is ACARA's role to review and update the Measurement Framework at least every three years.

While the measurement framework was adopted for the purposes of measuring progress towards the outcomes of the NSRA, it is not clear that it is the best means by which to make this assessment, particularly in relation to impacts on student learning. ISA would like to see an investigation of a more targeted approach that takes account of each reform intent. However, cautions that changing and / or introducing new metrics is burdensome and can be costly. Data collections are not easily or quickly changed or introduced, and this is particularly true of the Independent sector which does not have standardised IT systems or systemic supports.

For the purposes of measuring the progress towards the NSRA, ISA believes that reducing and focusing on key metrics may provide more targeted and relevant information to Ministers, the school sectors and the public.

9. CONCLUSION

ISA submits that:

- the views and perspectives of the Independent sector are important and need to be recognised in the formulation of the new NSRA
- there is value in articulating a national policy agenda that drives national improvement and reform
- the reform directions, the NPIs and the accompanying bilateral reform plans should set clear strategic directions while enabling flexible implementation – one goal, many pathways
- if there were to be any additions to the National Priority Initiatives, the Independent sector would support the inclusion of mental health and wellbeing.
- the bilateral agreements have a key role in ensuring agreed funding targets are met by state and territory governments
- appropriate financial support and/or incentives are required to enable successful implementation of national education reform
- consideration be given to targeting evaluation measures to specific reforms to better align with, and measure, the intent of the reform.

Thank you for your consideration of this submission