



# **Review of the National School Reform Agreement Submission to the Productivity Commission**

**June 2022**

FEDERATION OF PARENTS AND CITIZENS ASSOCIATIONS OF NEW SOUTH WALES

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# Introduction

The Federation of Parents and Citizens Associations of New South Wales (P&C Federation) is thankful for this opportunity to contribute to the Review of the National School Reform Agreement. P&C Federation supports the position of individual educational and developmental needs met by a range of differential services expressed through appropriate and well-planned curricula, programs and environments conducted by sensitive and well-trained personnel in conjunction with parents<sup>1</sup> and families.

The core belief of P&C Federation is that the education of our children and youth is the most fundamental means of ensuring individual success and success as a nation. Government's primary responsibility is to ensure education is equitable, well resourced and fully funded.

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

## Preamble

It is critical in any review of the NSRA or national measurement framework to highlight the key goals for education in Australia as enshrined in the Alice Springs (Mparntwe) Education Declaration:

- The Australian education system promotes excellence and equity
- All young Australians become confident and creative individuals, successful lifelong learners and active and informed members of the community

Although it is outside the review's terms of reference, P&C Federation needs to call out the current inequities within education in Australia. These come in three primary forms

- **Sector** – inequity in funding between government and non-government schools over decades has led to significant inequities
- **Geographic** – a continuing inequity between metropolitan and regional, rural and remote schools due to lack of qualified staff, limited access to facilities and resources and the issues created by distance
- **Priority cohorts** - inequities related to specific cultural groups, including Aboriginal and Torres Strait Islanders, children with disabilities and children with languages other than English

All these areas, while being identified and addressed to some extent, still need urgent attention. In particular, the Australian Education Act 2013 and, more recently, the bi-lateral agreements under the NSRA have allowed fundamental inequities to grow and grow over several decades. The overall impact has created significant challenges in delivering the NSRA outcomes, but more importantly, it directly impacts the goals of the Alice Springs (Mparntwe) Education Declaration.

P&C Federation would again stress that educating our children and youth is fundamental to ensuring individual success and success as a nation. Without urgent action to address the inequities that result from the Australian Education Act and bi-lateral agreements, we will continue to see growing gaps between education sectors and priority groups.

## The NSRA

The National School Reform Agreement, without doubt, provides for a level of cooperation between the commonwealth and state and territories where none would exist otherwise. In general P&C Federation supports the concept of the NSRA and, to some extent, its initiatives. The remainder of this submission details our reasoning behind this.

As stated in section 34 of the NSRA;

*The Parties commit this Agreement should contribute to the following objective: a. Australian schooling provides high quality and equitable education for all students.*

P&C Federation would question whether the signed parties have supported this commitment for our children and young people, particularly with the funding arrangements between state and federal governments favouring non-government education systems and the inequities that continue to exist and, in some cases grow.

If one of the targets of the NSRA is for Australia to be high quality and high-equity schooling system by international standards by 2025, then increased funding by both the state, territory and federal governments to close the divide and lift educational outcomes for government schools.

## The National Assessment Program

Parents recognise the importance of a national assessment program for identifying the shortfalls and strengths in education to plan for the future. More importantly, parents see this form of assessment as a way to inform them about their child's performance above the standard school reporting.

While gathering national data through standardised testing is important, it should not become the key driver for education or be the silver bullet to solve sliding standards. We see improvement being driven from the bottom up rather than from the top down, in other words, within the classroom. This can only be done by providing teachers with the training and resources to support learning.

We also see local, regional, state and national data derived from frequent school-based assessments, embedded as part of the curriculum and mainly invisible to students. This means moving away from the census-style NAPLAN testing to a more integrated, less obstructive and less stressful assessment program.

Our view of what nationalised assessment should look like consists of the following:

- First and foremost, it must be a diagnostic tool that informs teaching and learning.
- It must help inform parents of their child's progress against the curriculum. Parents not only need to know but have a right to know how their child is performing and how they and the school can further support student learning.
- It must be low-impact, non-disruptive testing: as far as possible, it must be part and parcel of everyday teaching and learning. This would reduce the considerable stress generated by mass testing, remove the teach-to-the-test mentality, remove the logistical nightmare from schools and refocus efforts on child-centric learning. We would argue that this change alone would significantly improve student outcomes.
- Any standardised testing must provide localised and timely data on student performance for teachers and parents and help quickly identify any trends that need to be addressed for the child, teacher or the school.
- School-based test data would then feed outwards, deidentified, to inform systems and governments on the bigger picture regarding the performance of regions, states/territories and the nation, thereby informing policy.

- Schools and systems must be accountable for their overall performance within the context of their environment. The focus here should be on improvement through targeted, non-punitive measures.
- Testing and assessment must be directly linked to and be embedded in the curriculum. Anything else detracts from teaching and learning.
- Teachers are best placed to know how a child is progressing and report to parents. This is why we support using more frequent low-stakes, class-based assessments as the front-line tool in the overall assessment of children.
- Any standardised testing regime must be inherently transparent in its methodology

The existing national assessment program has had limited impact in supporting the outcomes of the NSRA. Attempts to streamline national assessment, such as going on-line, have only complicated matters, significantly damaging confidence in the methodology and appropriateness of the testing.

It has produced an environment where the interests of schools, systems and governments are put ahead of that of the student. The My School website has created a false sense of school performance, driving the movement of students away from what are perceived to be poorly performing schools. The current NAP has significant flaws:

- NAPLAN is a point-in-time snapshot of how students perform within limited learning domains. With two-year gaps between testing, the only information that can be gleaned from the data in practice is a general trend in a child's learning trajectory. As a test to inform teaching and learning, the data points are too far apart and contain considerable uncertainty.
- The publication of NAPLAN results on the My School has created de facto league tables, which has, in turn, made NAPLAN a high-stakes test. It pits one school against another as they seek to maximise NAPLAN results for fear of losing students to other "higher-performing" schools. Anecdotally, there are numerous cases of schools gaming the results by asking underperforming students to not sit NAPLAN for fear of lowering the school ranking, though, to our knowledge, this phenomenon has never been investigated.
- The perceived high stakes have led to teaching-to-the-test approaches, with a large part of Term 1 devoted entirely to getting students ready for NAPLAN at the expense of teaching to the curriculum. While the NAPLAN review recommendations were to shift the assessment into early term 1 to help prevent this, tuition will undoubtedly continue over the summer break. The shift may also produce unexpected shifts in data as students returning after six weeks of the holiday are generally not at their peak academic performance.
- NAPLAN results ignore various factors such as random individual variation (which may impact individual NAPLAN results by as much as  $\pm 12\%^2$ ) and the size of schools (as smaller schools may show more significant natural variation in their scores than larger schools).
- NAPLAN only measures a narrow (albeit important) range of parameters. Due to its inherent limitations as a measure of student progress and its susceptibility to gaming outlined above, it is not a holistic view of student achievement even within the narrow range of parameters tested.
- The introduction of NAPLAN Online has undermined the credibility of NAPLAN results. Due to inadequate technology and supporting infrastructure, schools are still struggling to garner the technology necessary to undertake on-line testing, leading to inherent inequities.
- The transition period between 2018 and 2019 has resulted in both paper-based and on-line test results being used simultaneously. Although ACARA insists the results of both versions are comparable, there are serious doubts about the validity of this argument. These doubts were

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<sup>2</sup> Wu. 2009. *Interpreting NAPLAN Results for the Layperson*.

further compounded by significant technical issues experienced with the 2018 and 2019 NAPLAN Online tests.

- NAPLAN consumes a great deal of teachers' time that could arguably be better spent on core teaching and learning against the curriculum. It may contribute to the perception of the curriculum being overcrowded, with teachers having to play curriculum catchup once NAPLAN is completed.
- The testing impacts teaching and learning for those not sitting the tests significantly. This results from the complex logistics of implementing mass testing to be carried out to a specified timetable. One-third of a school will be tested taking over classrooms for up to two weeks, impacting other students' ability to learn. In particular, schools have reported that internet bandwidth has significantly reduced since the advent of on-line testing, limiting other students' ability to work on-line.

# Addressing the Terms of Reference

## Terms of Reference 1 - The appropriateness of the national Measurement Framework for Schooling in Australia in measuring progress towards achieving the outcomes of the NSRA

The national Measurement Framework specifically calls out the Alice Springs (Mparntwe) Education Declaration and specifies a number of commitments focused around

*All Australian Governments commit to working with the education community and in partnership with young Australians, their families, and the broader community to achieve the educational goals for young Australians.*

Apart from the comments provided previously about the goals of the Alice Springs (Mparntwe) Education Declaration, P&C Federation would emphasise the importance of education authorities working in partnership with parents and carers in achieving educational outcomes for their children. While this is often discussed and is supported in numerous studies, it is not often implemented. Parents have a significant role in their child's education. Including parents in the education process enhances outcomes for all concerned. P&C Federation would go as far as to suggest that parent/carer engagement becomes a significant initiative of the NSRA.

The National Measurement Program (NAP) does provide a level of data that can be used to inform policy that supports the outcomes of the NSRA. However, the frequency of data gathering, type of testing and quality of this data raises questions as to the efficacy of NAP for the reasons previously detailed in the preamble.

To address whether the national Measurement Framework for Schooling is appropriate for informing the outcomes of the NSRA, it is critical to analyse whether this data is sufficient to inform the established outcomes. These outcomes are discussed in detail in the following sections.

### OUTCOME 1 – Academic achievement improves for all students, including priority equity cohorts

P&C Federation would point out that academic achievement does not give a holistic picture of a student's journey. In the case of NAP, data is only being collected on a narrow set of domains giving a less than perfect picture of a student's attainment. NAPLAN, the core part of the NAP, only tests a limited domain within literacy and numeracy. While some testing does occur for other areas, this is not a core part of the assessment, leaving significant gaps in the coverage of a student's attainment. This is partly why P&C Federation have reservations about relying on the National Assessment Program, particularly NAPLAN in its current form.

Although academic domains are generally easier to test, a broader, more holistic assessment would give a greater overview of student progress and convey more meaningful information to parents and students.

**Sub-outcome 1.1: Lower the proportion of students in the bottom levels and increase the proportion of students in the top levels of performance (bottom two and top two bands) in the National Assessment Program–Literacy and Numeracy (NAPLAN) Literacy and Numeracy of Years 3, 5, 7 and 9.**

Lifting the performance of all students irrespective of the cohort is an objective that P&C Federation strongly supports. However, as the primary assessment under the NAP, NAPLAN only provides a narrowly focused and infrequent indication of student performance. The data collected is only sufficient to inform policy over the long term and has limited use for informing teaching and learning.

### Cohort tracking

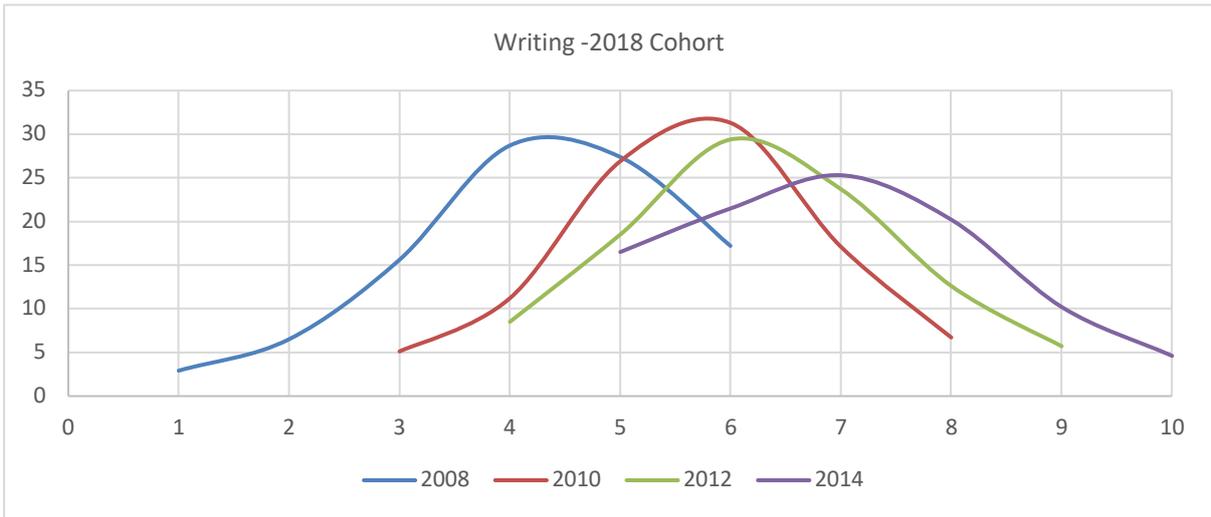
Although seeking to improve yearly band performance is important, P&C Federation would argue that a more meaningful measure would be to monitor cohorts as they move through the education system. Tracking students as they move from year to year provides a more useful measure of the value added to a student's education. The issue with NAPLAN is that testing a cohort is only undertaken every two years. P&C Federation believes that having greater visibility of a student's progress as they move from year to year is critical. It is important to note that P&C Federation is not advocating yearly NAPLAN testing. In line with previous submissions, we believe this sort of testing can be done more frequently and transparently as part of the normal teaching practice.

For example, graphs 1 and graph 2 below show the journey of a specific cohort, in this case, the group of children that first sat NAPLAN in 2008. Each curve shows the distribution of bands over the four NAPLAN tests these students would have sat between 2008 and 2014.

Graph 1 shows an improvement every two years in band shift, albeit slowing by year 9. There is also a narrowing of the overall curve, indicating that, by and large, this cohort improved in the spelling domain as they progressed through their schooling.



Graph 1: Progressive band performance of the 2018 student cohort in the NAPLAN spelling domain. The vertical axis represents the percentage of students. The horizontal axis represents each band. (source ACARA)



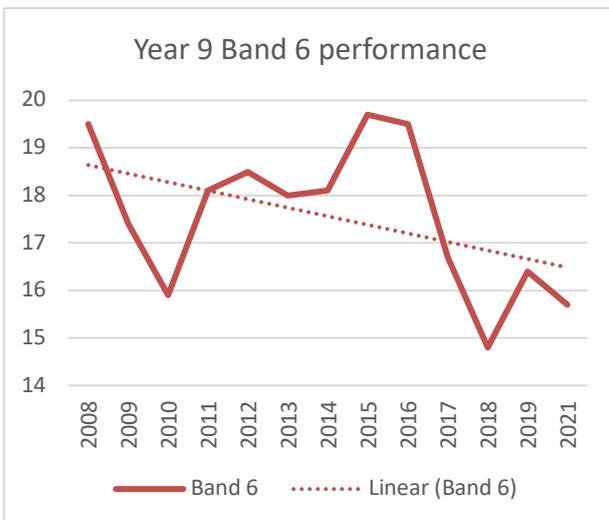
Graph 2: Progressive band performance of the 2018 student cohort in the NAPLAN writing domain. The vertical axis represents the percentage of students. The horizontal axis represents each band. (source ACARA)

Graph 2 shows the opposite of graph 1. While there is an upshift of students into higher bands over time, there is a lowering and broadening of the curves by year 9, reflecting a significant slow-down and poorer performance in writing capabilities.

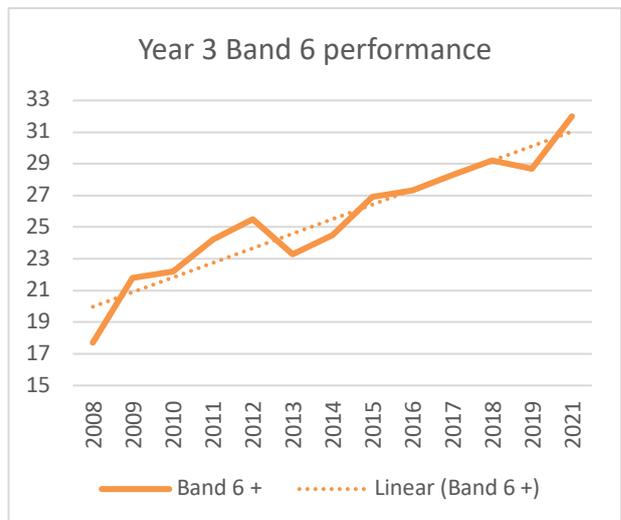
### Use of NAPLAN for short-term analysis

NAPLAN data is only really suitable for analysing long-term trends. P&C Federation would be wary of using the data over any short term as there is significant measurement error subject to significant year-to-year fluctuations that hide overall trends.

It is now 14 years since the introduction of NAPLAN, and while the data shows that there has been an upward shift in some domains over time, there have also been areas with no change or, in fact, areas that have gone backwards significantly, namely the writing. The results show that the overall trend could be misinterpreted if only analysed over the short term. For example, the following graphs show two sets of data, one with substantive shifts in performance and the other with a predictable upwards trend. This is typical of the relative stability of some domains and the volatility of others.



Graph 3: Band 6 performance for Year 9 in Grammar and Punctuation (source ACARA)



Graph 4: Band 6 performance in Year 3 in Reading (source ACARA)

Of note is that for the last 13 years of testing, the trends show that

- writing skills improved in Year 3 but went backwards in years 5, 7 and 9.
- Year 3 shows the greatest improvements over time with significant Reading, spelling, grammar, punctuation, and numeracy shifts.
- Year 9 shows the lowest changes over time with Reading, spelling and grammar, and punctuation hardly changed over 13 years.
- The lowest bands in each year group, other than the writing domain, show only marginal changes indicating that there are still the same number of children sitting in the lowest band in each year group

***Sub outcome 1.2: Lower the proportion of Australian students in the bottom levels and increase the proportion of students in the top levels of performance (proficiency Levels 1 and 2 and proficiency Levels 5 and 6) for the Organisation for Economic Cooperation and Development's (OECD) Programme for International Student Assessment (PISA) testing in Reading, mathematics and science***

PISA testing has become one of the most influential assessments in the education space and has a significant impact on the educational policy decisions of many governments. However, PISA was not designed to rank the performance of education systems against one another, just as NAPLAN was not designed to rank schools. PISA only provides a narrowly focussed glimpse of student performance, which comes with issues that should significantly reduce PISA's weighting within the National Assessment Program.

Australia has recorded a steady decline in PISA test results across all three domains (science, Reading & mathematics) since 2000, which is of significant concern without context. P&C Federation would question the importance given to PISA for several reasons:

- Unlike NAPLAN, which is run yearly, PISA is run every 3 years and only for a random selection of 15-year-old students. This leaves a gap in assessment for 2 years. For this reason, it can only be seen as a low-level supplementary assessment.
- The Australian Council for Educational Research (ACER) found that when reviewing the 2018 test results, many Australian students did not try because the PISA test did not count towards their marks. This has led ACER, who administers the test, to conclude that the results could be more of a measure of student effort or interest than a measure of student learning.
- Overseas research has also shown a wide variation in the efforts of students from specific countries, with many Asian countries seeing PISA as a high priority in contrast to those in Europe.
- Australia is not the only OECD country that has been in decline. PISA data shows that students across many OECD countries are increasingly dissatisfied or disconnected from school. This has increased from 7% to 22% over a short period and may reflect how seriously students take the PISA testing.
- The decline in PISA results in 15-year-old students is at complete odds with the improvement in rankings when students reach Year 12. This also reflects student engagement at this point in a student's schooling.
- PISA scores are also impacted by the different delivery timing of a curriculum. A student's progress within the curriculum will not be the same across Australia, let alone across OECD countries. This makes comparing countries and even states within Australia problematic.

- The OECD has entered into partnerships with for-profit companies that stand to benefit from any real or perceived issues revealed by PISA testing. This presents an apparent conflict of interest and raises significant issues as to the independence of the results.

An overreliance on PISA scores and rankings creates a distorted picture of countries' standing in relative and absolute terms. It places undue pressure on the education system to "compete" for the sake of international pride rather than supporting the actual needs of students within Australia's unique demographic and geographic constraints.

**Recommendation:** *That PISA testing is removed from the NAP. It should be replaced by an expanded form of national testing that includes science and other domains as part of a holistic assessment approach*

**Sub outcome 1.3: Lower the proportion of students from priority equity cohorts in the bottom levels and increase the proportion of students in the top levels of performance (bottom two and top two bands) in NAPLAN Literacy and Numeracy for Years 3, 5, 7 and 9**

As previously commented, NAPLAN is a narrowly focused assessment, and while P&C Federation is supportive of raising student outcomes, it should be across a broader range of domains, not just numeracy and literacy. Over the last 13 assessment cycles, there has been some improvement in certain domains but regression in others. However, there has been a widening gap between priority and non-priority cohorts. This is primarily due to the increasing inequities in how education is funded within Australia. Until this inequity is addressed, priority cohorts will continue to lag behind their non-priority classmates.

**Recommendation:** *That urgent priority be given to addressing the inequities within the education system, particularly sector funding.*

**Sub outcome 1.4: Reduce the gap in achievement between students from various socio-economic backgrounds in Australia's PISA educational performance compared to other countries and the OECD average**

We refer to the comments provided in Sub-outcome 1.2 around PISA testing being used in the national assessment program.

**Sub outcome 1.5: Increase the proportion of young people from priority equity cohorts who have completed year 12 or equivalent or gained a qualification at the Australian Qualifications Framework (AQF) Certificate III or above**

Refer to the comments in Outcome 3.

## **OUTCOME 2 - All students are engaged in their schooling**

**Sub outcome: Increase the proportion of students attending school 90 per cent or more of the time, including students from priority equity cohorts**

The current KPM of school attendance does not indicate student engagement. It is simply a measure of attendance. Although there is no learning if a child is not at school, it does not necessarily follow

that if a child is at school, they are learning. Therefore, getting students to attend school is a starting point, not engagement itself.

Although getting students to attend school more often is generally seen as a positive step, measuring actual engagement is a more difficult proposition. Engagement in the classroom is best determined by teachers. The reasons for engagement or disengagement are best determined by asking students.

The statistics uncovered through PISA testing show that student engagement or belonging at school has had a dramatic negative shift. It may well be worth considering assessing student wellbeing as part of the NAPLAN process to gauge children's level of engagement at school and understand their issues, fears and aspirations.

According to the Mission Australia Youth Survey Report 2021, 45.7% identified Covid 19 as one of the most critical issues in Australia, compared with 38.8% in 2020. Young people identified areas of their life negatively impacted by COVID-19, with the top three areas impacted being;

- Participation in activities 68.3%
- Education 62.3%
- Mental health 50.3%

P&C Federation questions whether the National Measurement Framework for Schooling in Australia has the scope to support students during a pandemic or other natural disasters and provides the appropriate framework and flexibility of priorities to support and engage students in their schooling and learning

***Recommendations:***

*There is a national initiative to quantify why there is a falling engagement or sense of belonging at school. These results are used to implement programs and support to re-engage students in their education.*

*There is an urgent national initiative to support programs, including more flexibility in learning pathways, to address the impact of COVID-19 and natural disasters on student's education*

## **OUTCOME 3 - Students gain the skills they need to transition to further study and/or work and life success.**

***Sub outcome: Increase the proportion of young people who have completed year 12 or equivalent or gained a qualification at AQF Certificate II or above***

P&C Federation supports a student being able to choose their own pathway to further education and employment. Unfortunately, the current system is strongly biased toward students moving into higher education and therefore focuses heavily on academic courses and outcomes. This tends to place those students who are more trade, skills or work focused at a disadvantage.

The dismantling of TAFE within NSW and the subsequent commercialisation of trade-based courses have created an artificial barrier for students, with the courses being provided generally being of lower quality than those provided by TAFE in its heyday. Students undertaking an apprenticeship are often left untrained by commercial training organisations and taken advantage of by employers resulting in low-quality tradespeople or disillusionment in the trade.

There is also significant uncertainty around school-based training courses. Those schools that have invested heavily in providing on-site training are now at risk of losing their facilities, significantly reducing the flexibility and convenience provided to students. Students undertaking School Based

Apprenticeships or Traineeships are also at a disadvantage as they often have to catch up on required school work and meet their trade training requirements.

In terms of the national trend, the number of students completing year 12 has only increased by just over 1% per year since 2009, an increase of around 2000 students in over a decade. In NSW, which makes up around one-third of all students in Australia, the average increase in school completion has been less than half of the national average, being 0.45%.

COVID-19 has particularly impacted the completion rate for year 12, which has dropped from 190,000 to 179,000 (5%) in a single year. The impact on NSW was a drop of 3,470 students. Anecdotally students have decided not to complete year 12 due to their belief that years of disruption to learning would negatively impact their ATAR. Therefore, they appear to have sought opportunities in vocational education or moved directly into the workforce.

Data from the [National Report on Schooling in Australia 2020](#) indicates that the proportion of the 15–19-year-old population, including secondary students, undertaking vocational education and training (VET) decreased (but not significantly) from 27.2% in 2019 to 26.3% in 2020. The long-term trend in this measure since 2015 was downward.

In 2017 an Independent Review into Regional, Rural and Remote Education was undertaken by Dr John Halsey on behalf of Senator the Hon Simon Birmingham, Minister for Education and Training. It was identified in the final report in 2018 that,

*"Major differences in achievements and successful post-school pathways between urban and rural, regional and remote children and young people, have persisted for decades" (Review Discussion Paper, 2017, pp 15-18)*

Unfortunately, these differences continue to this day. Very little seems to have been achieved in meeting the recommendations to date, and it should be a national priority to help lift educational outcomes.

#### **Recommendations:**

- An urgent review into vocational education and training provision within Australia with a view to
  - tightening consistency, affordability, delivery and quality of delivery
  - ensuring the range of training courses is appropriate for current and future needs
- Introduce a national program that increases the number of people with industry/business experience working closely with schools and students to provide vocational pathways advice and to assist students in negotiating the training and/or employment pathway they want to follow
- Expand the availability, affordability and accessibility of high-quality work experience placements, VET, dual VET/university options and two-year associate degree programs.
- Incentivise vocational education institutions to develop regional strategies for vocational training in regional areas
- Increase the availability of flexible, responsive and affordable associate degrees, dual VET/university options and VET programs for current and emerging new industries

- Support a significant Renewing the Regions national education and training initiative for at least five years to grow regional, rural and remote employment opportunities and build the human capital required for vibrant, productive and sustainable communities

**Terms of Reference 2 - The effectiveness and appropriateness of the National Policy initiatives outlined in Part 3 of the NSRA, recognising the national reform take time to implement and mature, and for the effects of coordinated national reform to materialise.**

P&C Federation sees the current initiatives in part 3 of the NSRA as only being superficial. However, we believe more can be done in this space, including

- Supporting equity by enshrining needs-based funding without the ability of federal education ministers to provide additional funding to particular sectors arbitrarily
- a complete review of the Initial Teacher Education (ITE) system to identify issues and standardise ITE across the country
- a national review of vocational education provision to strengthen the quality and delivery of appropriate courses and the flexibility for students to study at school or with an external RTO
- greater support for teachers in making informed decisions about student progress and suitable resources
- Infrastructure programs as a national priority
  - Infrastructure funding program for government schools implemented
- That Information and Communication Technology (ICT) is a national priority for our schools
  - Improving internet access, availability and bandwidth nationally
  - Access to computers or tablets (again, an equity issue)
  - That ICT is funded as part of the NSRA
- Health and wellbeing as a national priority
  - Funding and resourcing for health and wellbeing initiatives
- Supporting family-school-community partnerships for children's learning as a priority

***A (i) Enhancing the Australian curriculum to support teacher assessment of student attainment and growth against clear descriptors***

The national literacy and numeracy learning progressions were trailed as an optional aid for teachers in 2020 in NSW. This has provided another level of assistance for teachers to categorise student attainment, but it has also created some confusion as it sits alongside pre-existing student progress criteria.

There has been general support from the teaching profession for the progressions, but there is also an undercurrent of caution as to the overall validity of progressions, with critics pointing to the abandonment of this type of approach in the UK.

The danger with all student progressions, whether developed from an evidence base or not, is that it is too easy to create an ideal viewpoint about how we would like learning to progress rather than allowing for more realistic pathways. It is also critical to point out that the progressions only provide a method of categorising or ranking progress in various skills in numeracy and literacy with no tie to average expectations of student development.

Of concern to P&C Federation is that the learning progressions will encourage the adoption of a linear order of cumulative learning where in reality, children learn in different ways, and some subjects are not necessarily cumulative. If a student does not meet a specific descriptor in a progress stage, it does not mean they have not met part of a higher level descriptor. This might be missed with linear thinking.

**Recommendation:** *There needs to be clear guidance to allow for more flexibility within the progressions to cater for students who do not follow the progressions expectations. Randomised standardised testing could be used to support this.*

#### ***A (ii) Assisting teachers monitor individual student progress and identify student learning needs through opt-in on-line and on-demand student learning assessment tools with links to student learning resources, prioritising early years foundation skills***

P&C Federation believe that more frequent and low-stakes randomised standardised testing is more valuable and appropriate than the NAPLAN-style census testing for informing teaching and learning. Provided the testing tools are designed in cooperation with the teaching profession, they can provide valuable information to assist teachers in identifying student needs as early as possible. Such on-line testing can also look for higher skills that may be missed through the assumption of linear progress.

**Recommendation:** *That NAPLAN be gradually phased out in favour of randomised standardised testing that can feed into the National Assessment Program but be primarily used to inform teaching and learning at the school level.*

#### ***A (iii) Reviewing senior secondary pathways into work, further education and training***

P&C Federation participated in the Review of Senior Secondary Pathways in 2019. In broad terms, P&C Federation are generally in support of the recommendations of the review. While the reviews findings were handed down in June 2020, there appears to be only minor movement in implementing the recommendations. As of December 2020, only a small number of the recommendations are being actioned. Owing to the nature of issues identified by the review, all recommendations need to be prioritised.

**Recommendation:** *That all of the recommendations of the Review into Secondary Pathways be incorporated as priority initiatives*

#### ***B (i) Reviewing teacher workforce needs of the future to attract and retain the best and brightest to the teaching profession and attract teachers to areas of need***

This is a complex area where a great deal of neglect over decades has resulted in the teaching profession being seen as increasingly unattractive to new graduates and less attractive to long-term experienced teachers. Key areas of concern are

- remuneration levels compared to other professions
- high workload and stress levels

- low levels of autonomy
- poor prospects for career advancement

These were highlighted in the recent "Valuing the teaching Profession" Inquiry commissioned by the NSW Teachers Federation.

The profession has moved away from teaching to data collection and compliance with accreditation and other short-term educational initiatives. Students have now been commodified rather than prioritised. A substantial increase in reporting, red tape and compliance for teachers has seriously impacted their time to teach and, as a result, it has impacted the outcomes for their students. This is reflected in national assessment results.

Although it is admirable to attract the best and brightest into the teaching profession, many decades of experience as parents demonstrate that the brightest do not always make the best teachers. Great teachers are not just subject experts but great communicators who want to get the best out of their students. Any initiative to attract teachers must address the key areas of concern above. It must also be coupled with attracting

- Graduates that demonstrate a high aptitude and ability to teach
- Late-entry teachers, i.e. those who have industry experience and have the ability and aptitude to teach

There is a significant teacher supply crisis looming over the next decade. It could even be argued that the crisis is already here, exacerbated by the COVID-19 pandemic. Urgent action must be taken to address the falling number of quality candidates choosing to enter the teaching profession and retain those already in the system.

***Recommendation:*** *There is urgent action to address the recruitment and retention of quality teachers within the education system, not just high-performing graduates.*

### ***B (ii) Strengthening the initial teacher education accreditation system***

P&C Federation would agree that pre-service teachers must complete a recognised final-year teaching performance assessment before graduation. We would go further and argue that any recognised assessment should

- be a nationally recognised assessment to ensure consistency across the multitude of institutions providing ITE courses
- provide for a minimum of three placements over the term of a course which is all part of the assessment
- contain a requirement for a minimum period for face-to-face placements over the term of the course
- Require the first placement to be within the first year of the course in order to give ITE students a taste of face-to-face teaching

***Recommendation:*** *That this initiative incorporates the points raised above as part of any pre-service assessment*

***C (i) Implementing a national unique student identifier (USI) that meets national privacy requirements in order to support better understanding of student progression and improve the national evidence base***

Although the legislation to support national student identifiers was established in 2014 under the Student Identifiers Act for students undertaking nationally recognised training, it has not yet been rolled out to primary and secondary students as far as we know. To P&C Federations' knowledge, discussions around the use and safety of the ID are still ongoing.

P&C Federation does not believe this initiative is a critical national priority as it has no real impact on the outcomes of students. Students can already be identified by other means, and to our understanding, there is no pressing need for an extension for primary and secondary students.

In addition, P&C Federation has raised several concerns about how the national identifier would be used, who would have access to individualised data and the potential privacy and security issues that come from this. With many government entities sharing data with commercial organisations, we would have significant concerns from parents that data on their children could be inappropriately used to target students and their families or sold to other organisations.

To this date, P&C Federation are unaware of how these questions are being addressed. We are also aware that we were not the only stakeholders who have raised these concerns.

***Recommendation:*** *That this initiative be removed from the NSRA or at least placed as a very low priority*

***C (ii) Establishing an independent national evidence institute to inform teacher practice, system improvement and policy development***

P&C Federation had initial concerns around the purpose and role of a national evidence institute. These concerns remain even after the establishment of the Australian Education Research Organisation (AERO). Although P&C Federation can see some benefit to a national, centralised repository to inform teaching practice, we do not see it as a national priority. The danger with any nationalised advisory organisation is that it becomes the defacto standard at the exclusion of all else.

P&C Federation is still not convinced that this national body will be worth the investment and time considering NSW already has an educational research organisation (CESE).

***Recommendation:*** *That this initiative be removed from the NSRA or at least placed as a very low priority*

***C (iii) Improving national data quality, consistency and collection to improve the national evidence base and inform policy development.***

P&C Federation would agree that gathering data around

- Child developmental status at school entry
- Student learning gain
- General capabilities
- Post-school destination information
- Student attainment, retention, wellbeing
- Post-school outcomes

would help inform national policy. However, it must be done in a manner that does not create any additional burden on the school, teachers, parents or students. It must not interrupt teaching and

learning, and it must have the privacy of the student and their families protected. In addition, any such data collection must be tied to an outcome, goal or initiative to drive positive outcomes.