INDEPENDENT

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

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

MENTAL HEALTH

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