



5 July 2011

Ms Amanda Rishworth MP
Chair
House of Representatives Standing Committee on Education and Employment
Parliament House
CANBERRA ACT 2600

Dear Ms Rishworth

The Association of Independent Schools of South Australia (AISSA) welcomes the opportunity to make a submission to the Committee's Inquiry into the Schools Assistance Amendment Bill 2011.

The AISSA represents the interests of 95 (100% membership) Independent schools in South Australia. The diversity of the schools within the membership is illustrated in the attachments.

The AISSA provides a wide range of support services to Independent schools in relation to planning and implementation of the Australian Curriculum, including assistance in reviewing existing school curriculum, professional development (individual schools and sector wide), briefing school leaders and school boards and ensuring the Independent school sector is engaged in the consultation processes established by ACARA. This is being undertaken primarily through school membership subscriptions.

On the basis of the context provided below the AISSA strongly supports the proposed amendments to the legislation.

In accordance with Section 22 of the *Schools Assistance Act 2008*, the Funding Agreement between the Commonwealth of Australia and an Independent school's approved authority includes at Clause 10.8 the requirement the approved authority 'must ensure that the school implements the national curriculum prescribed by the Regulations for primary education or secondary education (or both, as applicable) on or before 31 January 2012'.

The approved authority for Independent schools may either be a system authority (such as Lutheran Education) or each non-systemic school. The Funding Agreement therefore is an illustration of a direct link between the receipt of Australian Government funding and required accountability requirements.

The timing of the development and implementation of the Australian Curriculum therefore directly impacts on individual Independent schools or the system authorities through their Funding Agreements.

Australian Curriculum

The AISSA is aware that development and implementation of the Australian Curriculum will be undertaken in a phased manner in order to ensure time for appropriate consultation, the mapping of the Australian Curriculum against existing curriculum, professional development of school management and teachers and obtaining agreement across States and Territories and sectors.

Three phases of curriculum development have been identified by ACARA. (See Attachment 4). This development extends beyond the end of 2012, for F-10 and even further for the senior secondary years. Implementation for the senior secondary years is unlikely to commence in South Australia for Phase one curriculum until the beginning of 2015. (See Attachment 5).

Phase one (F-10) of the Australian Curriculum was endorsed by MCEECDYA in December 2010. A three year implementation period was agreed for this phase commencing in 2011, with substantial implementation by the end of 2013.

However there still remains substantial work to be undertaken to support the above implementation of Phase one curriculum, including:

- Establishing a national common approach to the achievement standards and trialling and validating that approach across States and Territories;
- Further refining and adjusting the curriculum content as a result of validating achievement standards and feedback from teachers;
- Finalising a clear overarching framework that assures the place and integrity of all Learning Areas within the context of the overall school curriculum;
- Developing the curriculum content and achievement standards as required to meet the needs of special needs students;
- Engaging with the teaching profession in the implementation of these processes to ensure comprehensive preparation for substantial implementation by 2013.

This work is underway; however it is fundamental to successful implementation of the curriculum. It is also noted that some States (e.g. Western Australia) support widespread implementation when the refinements and adjustments as outlined above are completed.

Given the significance of the project and the outstanding tasks to be completed it is important that appropriate consultation occurs with the Independent sector in each State and Territory.

Some schools within the Independent sector deliver recognised alternative curriculum such as the International Baccalaureate, Steiner and Montessori. The Australian government has given a commitment that processes will be established by ACARA to determine the 'equivalence' of these recognised curricula. Procedures have been established by ACARA;

however given the extended period over which the Australian Curriculum will be developed this recognition process will also extend well beyond 2012.

Phase two of the curriculum development, covering the Learning Areas of Languages, Geography and the Arts is still in the early stages of development. The schedule for completion of this work has recently been extended by ACARA. For instance, curriculum for Languages is not likely to be completed until mid 2013.

A third phase of development will be required to cover the remaining Learning Areas identified in the Melbourne Declaration on Educational Goals for Young Australians. (See Attachment 6).

Further development work is also underway on two other key elements of the Australian Curriculum. These include the *General Capabilities* and the *Cross-Curriculum Priorities*.

Of particular concern to AISSA member schools is the senior secondary years. South Australian has recently introduced a new senior secondary curriculum following an extensive review. School staff have undertaken substantial professional development to facilitate the implementation of the new SACE curriculum and assessment and reporting procedures.

The work by ACARA on the Learning Areas of Mathematics, the Sciences, English and History for the senior years is in its early stage. Significant issues remain regarding the timelines for the development of the senior secondary curriculum, its alignment with the F-10 Australian Curriculum, and the certification, assessment and reporting for Years 11-12.

While timelines for the development of senior secondary years have been extended to November 2012 for Mathematics, Science, English and History, an implementation timeline for the senior secondary curriculum is yet to be agreed.

There are fundamental issues relating to the alignment of existing standards and approaches to assessment and reporting in the senior secondary years, (which are currently the responsibility of jurisdictional curriculum authorities), with those proposed by ACARA. These matters will need to be resolved before successful implementation can occur.

It is very unlikely that South Australia will be in a position to implement the Phase one senior secondary curriculum until 2015. The timeline will have to accommodate the accreditation processes required by the SACE Board in South Australia.

The lack of any consistent funding to support the implementation of the Australian Curriculum across States and Territories and school sectors will inhibit the success of the significant reform. There is significant variation in the capacity of each Independent school in terms of readiness to implement the Australian Curriculum. This particularly applies to rural schools and smaller metropolitan schools that have neither the expertise among the staff or the recurrent funds to allocate to the planning.

This deficit situation will need to be taken into account when determining the implementation schedule for each Learning Area.

We note that the regulation will prescribe any new version of the Australian Curriculum authorised by the Council of Governments' Standing Council for School Education and Early Childhood. This Council is advised by AEEYSOC which consists of the CEO's of State and Territory education departments. There is no representation of the two Non-Government sectors on this key group. This is a long standing significant issue for the Non-Government

school sectors. The CEO's of government departments do not represent the Non-Government school sectors. At the very least the representative organisations within the two Non-Government sectors should be consulted about the implementation schedule for the Australian Curriculum.

Clearly the above context demonstrates the need for the amendment to repeal the current implementation date of 31 January 2012 and substitute a new provision enabling a standing regulation to prescribe the national curriculum and associated implementation timeframes

Yours sincerely

Garry Le Duff
Executive Director.



Schools Assistance Amendment Bill 2011 - Attachments

5 July 2011

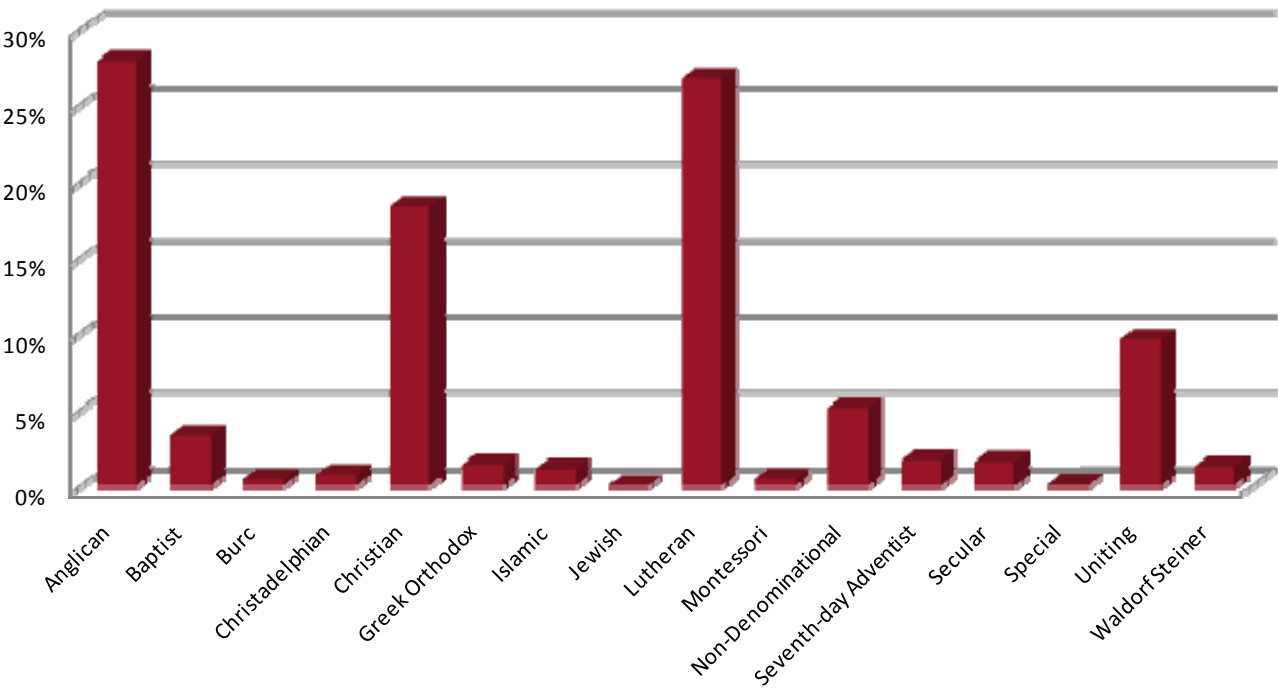




Sector Profile

Religious Affiliation/Educational Philosophy

Percentages of South Australian Independent School Students by Schools' Religious Affiliation and Educational Philosophy 2010
(Source: February Census, Non-Government Schools Secretariat 2010)

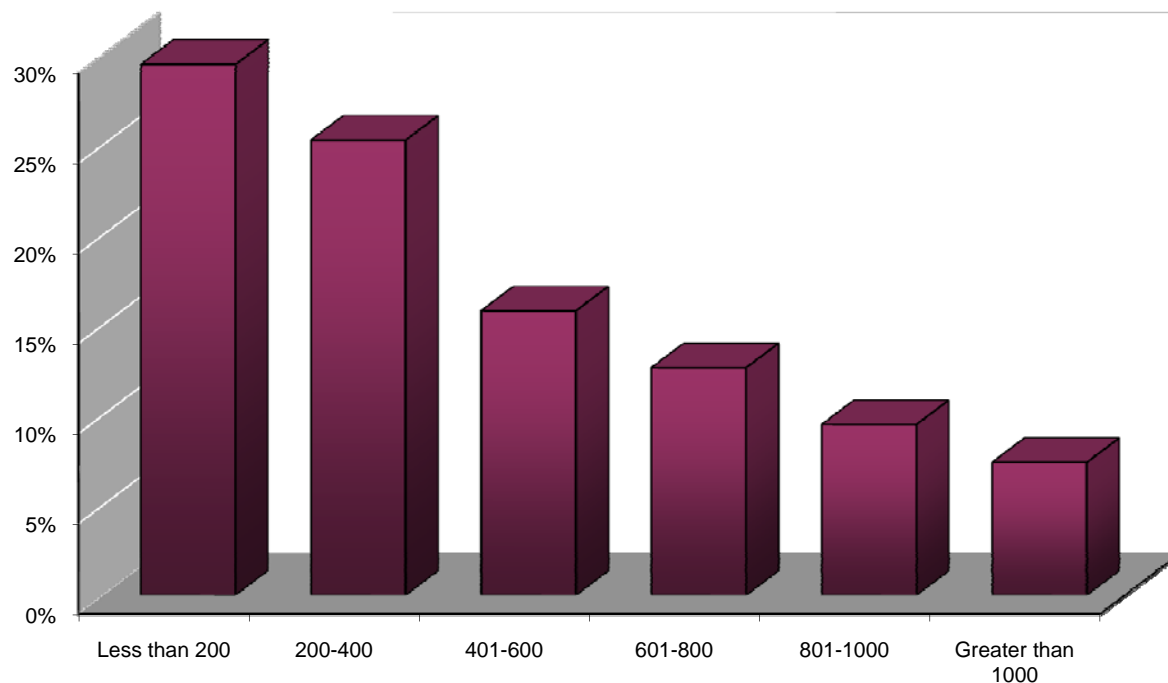




Sector Profile

School Size

Percentages of South Australian Independent Schools by Size of School 2009
(Source: February Census, Non-Government Schools Secretariat 2009)



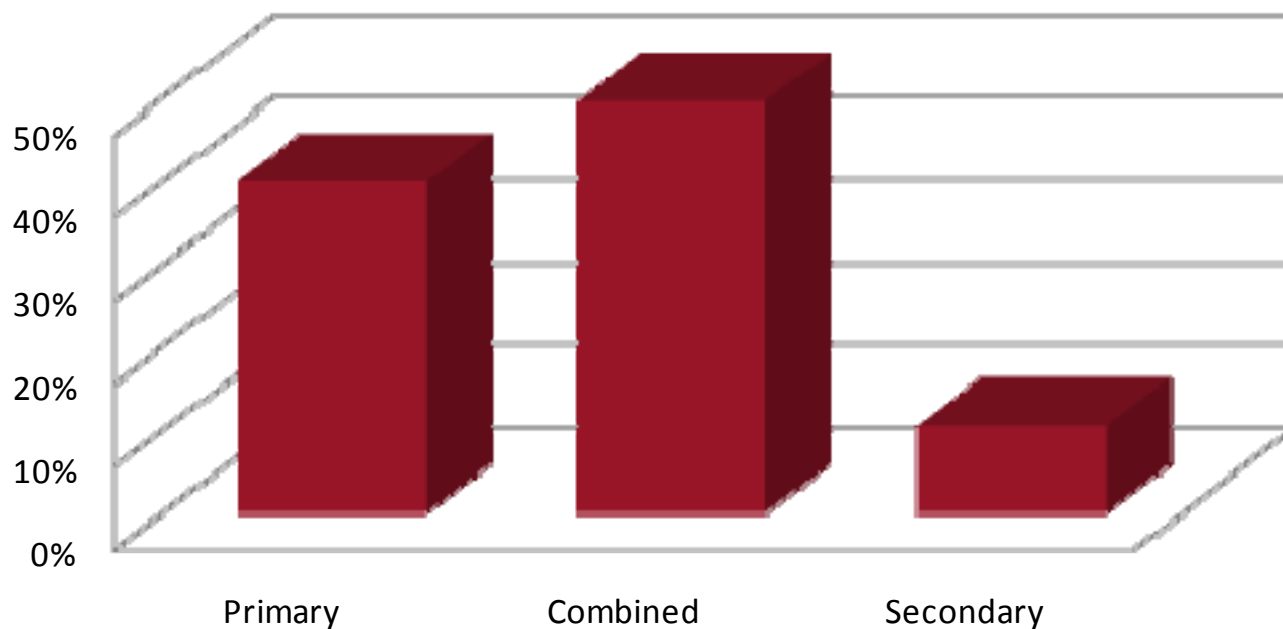


Sector Profile

School Year Ranges

Percentages of Primary, Combined and Secondary South Australian Independent Schools 2010

(Source: February Census, Non-Government Schools Secretariat 2010)





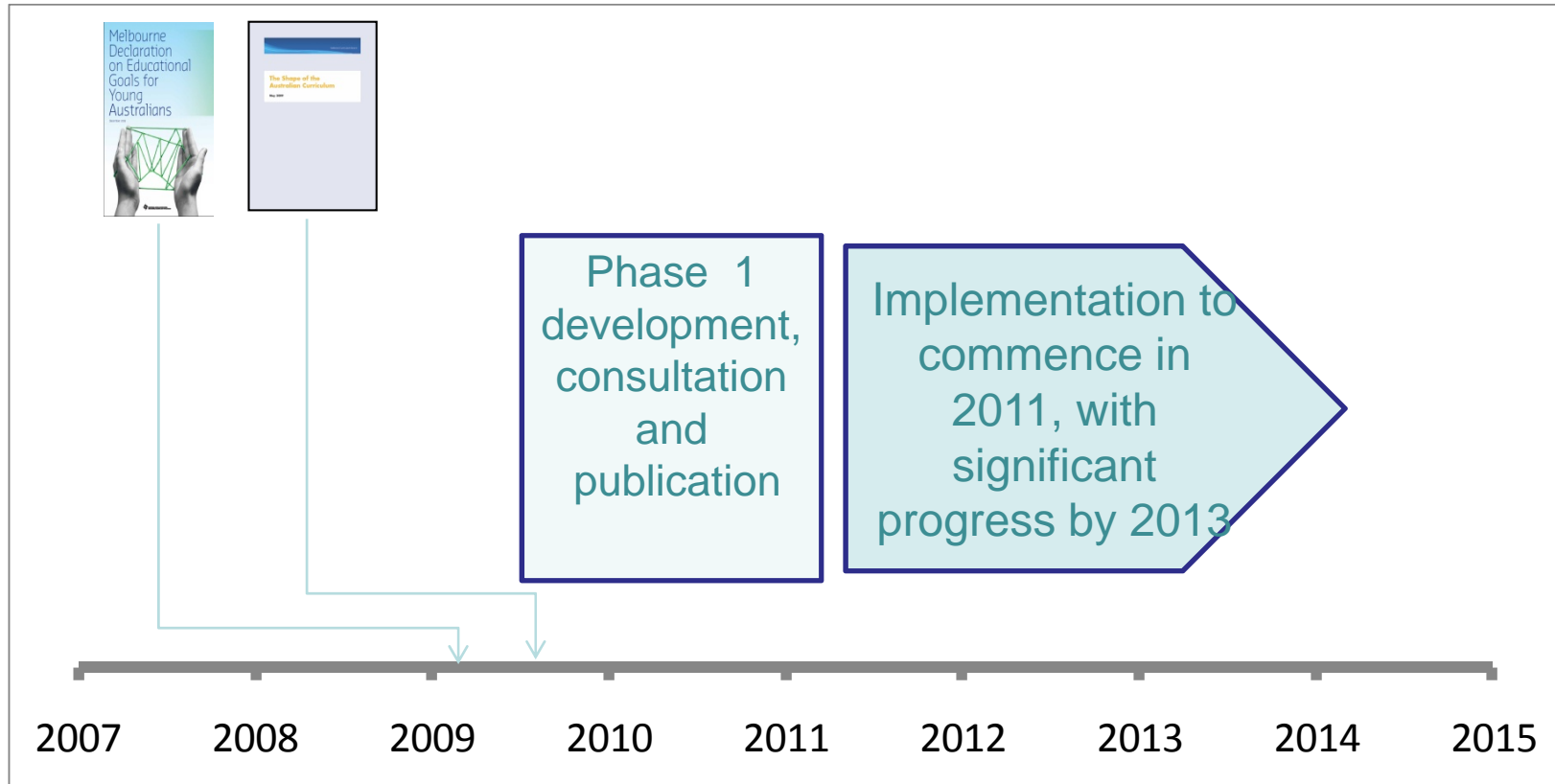
Attachment 4

Plan for the Development of the F-10 Australian Curriculum

Learning Area	Phase 1	Phase 2	Phase 3	Notes
English	English F-10			
Mathematics	Mathematics F-10			
Science	Science F-10			
Humanities and social sciences	History F-10	Geography F-10	Economics / business 5-10 Civics and citizenship	To include attention to financial literacy requirements; optional 9-10 The Civics and Citizenship curriculum will be conceptualised with reference to the existing national statement of learning for civics and citizenship; optional 9-10
Languages		Languages		Consideration will be given to developing the languages curriculum around standards of language proficiency, rather than curriculum content organised by years of schooling
Arts		Arts F-10		Providing for learning in Dance, Drama, Media, Music and Visual Arts K-8; option 9-10
Health and physical education			Health and physical education F-10	
Technologies			Design and technology 5-10 ICT 3-10	Option 9-10 Subject to development of ICT general capability continuum and how best to provide for the teaching of specific ICT knowledge, skill and understanding; option 9-10



Australian Curriculum Development – F-10



Attachment 6

Development and Implementation Timeline for F-10 Australian Curriculum (First Stage Approved)

Learning Area (F-10)	Development Started	Development Completed	Implementation from	Substantial implementation by
English	2008	2010	2011	2013
Mathematics	2008	2010	2011	2013
Science	2008	2010	2011	2013
Humanities and social sciences	History 2008	2010	2011	2013
	Geography 2010	2011	2012	2014
	Business / economics 2011	2012	2013	2015
	Civics and citizenship 2011	2012	2013	2015
Arts	2010	2011	2012	2014
Languages	2010	2011	2013	2014
Health and Physical Education	2011	2012	2013	2015
Technologies	Design and technology 2011	2012	2013	2015
	ICT 2011	2012	2013	2015