



ASSOCIATION OF HEADS OF INDEPENDENT SCHOOLS OF AUSTRALIA

Committee Secretary
House Standing Committee on Education and Employment
PO Box 6021
Parliament House
Canberra ACT 2600
Australia

Thursday 14 February 2013

Dear Secretary,

Inquiry into the *Australian Education Bill 2012*

I write in respect of the *Australian Education Bill 2012*, as a means of providing input from the membership of the Association of Heads of Independent Schools of Australia (AHISA) as the Government seeks to establish a framework for school improvement.

As the Government continues to seek to secure agreement with States and Territories and Catholic and independent schools, particularly in respect of the development of benchmarks, the details of implementation and the linkage with funding, AHISA would appreciate the opportunity for ongoing consultation and feedback. In particular, the mechanism by which the Government proposes to put in place school improvement plans and to evaluate school performance is a matter of strong interest, and AHISA seeks to have input at the appropriate juncture into this issue on behalf of our members.

This submission refers to general issues in the first part before commenting on particular sections of the *Australian Education Bill 2012* in the latter part.

Issues

The Inquiry into the *Australian Education Bill 2012* (the Bill) is broadly framed, as is the Bill itself, and includes within its terms of reference matters that have the potential to have a fundamental and defining impact on the quality of teaching and learning, depending on the further detail in this and that of related Bills and implementing arrangements. In particular, the quantum of funding linked to the education reforms is of a high order such that it represents a once-in-a-generation opportunity to achieve improvements in the performance of schools and school student outcomes. As such, AHISA supports generally the purported outcomes sought by the panel undertaking the Review of Funding for Schooling. AHISA's focus is to contribute to the debate to ensure measures adopted are appropriately identified, targeted and implemented when the details of the Government's response is known.

Our experience, we believe, mirrors international evaluations such that there appear to be correlations between improved educational outcomes and school autonomy, where there is also accountability. It is imperative, in our view, that the form of this accountability enhances, and does not stifle or inhibit, the autonomy for school leaders to make decisions about teaching and learning practices in the best interests of their schools and school communities. This needs to include the benefit of the insight of school leaders into matters such as demographics, other local matters and whole-of-school approaches to teaching and learning. Above all, we seek that measures of accountability should be high level and should allow schools to do what is best in their own environment, rather than be prescriptive and limiting.

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The direction of reform, both at the Commonwealth level and in some States, towards greater autonomy and local decisionmaking is a positive development, and mechanisms for accountability should be congruent with this. By way of example, I refer to the Western Australian Government's Independent Public Schools initiative, under which some 250 Western Australian public schools are operating with increased autonomy and heightened accountability. Under this initiative, and in collaboration with their school community, Independent Public Schools set their own strategic directions, have authority for day-to-day decision making and have greater capacity to make decisions that cater for their students. Elements of their autonomy include staff selection, greater capacity to independently manage financial affairs, and determine the curriculum that best suits student needs. I understand that the initiative is included in the implementation plan for a National Smarter Schools Partnership between the Commonwealth and Western Australian Governments, under which the Commonwealth provides funding to improve teacher quality, numeracy and literacy and the performance of students in low socio-economic communities.

Our response to the Bill is presented below and includes comments in respect of the mechanism and the implementation of measures for school improvement, possible benchmarks for assessing the performance of schools and school students (as are referred to in Section 8 of the *Australian Education Bill 2012*) and further comments under the categories appearing in the Bill of quality teaching, quality learning, empowered school leadership, transparency and accountability, and meeting student need.

Section 6 Developing a national plan

Section 6 of the Bill refers to the Commonwealth working with ... "the Governments of the States and Territories, and non-government education authorities, to develop, and implement, a national plan" and refers in a notation to States and Territories and non-government education authorities that agree to implement the national plan being provided with school funding in accordance with Section 9 of the Bill. This Section does not specifically refer to non-systemic schools. It is not clear whether "non-government education authorities" is intended to encompass independent schools, and AHISA emphasises that the governance arrangements for independent schools are such a significant proportion do not operate within systems.

The structures and processes to be implemented, by which school improvement is to be monitored and assessed is of importance, and has implications for independent schools that may differ from their counterparts that are administered on a systemic basis. This matter requires consultation with the independent schools sector and careful consideration as arrangements are negotiated. Any plan (whether the national plan, or an arrangement with a Government or non-government education authority to implement agreed objectives through a school improvement plan) should be constructed in terms that adequately reflect differences of approach between schools, either in the application of a plan or in the evaluation of results. It is important that this is not process-driven or exhausts resources that should be directed at teaching activity, but is directed at accountability where there is a clear and demonstrable link between the adoption of practices and the provision of data on the one hand, and school improvement on the other. Similarly, if school self-assessment is to be undertaken, it should not be too onerous on resources, should not result in the significant diversion of resources, and should be flexible enough to incorporate a range of ways in which schools are working to improve educational outcomes. Unless there is flexibility within this process, the capacity of independent schools to exercise

informed decisionmaking about such matters as resource allocation and teaching practices may be compromised.

AHISA regards it as important that the desirability of the adoption of any nationally imposed strategy or target does not outweigh the consideration that schools will have differentiated capacity to meet any such targets, including the level of resources. It is important that means are put in place to assist schools with less resource capacity, and that a punitive approach is not adopted where schools have less capacity to address policy priorities.

Section 7 Reform directions for the national plan

Quality teaching

While AHISA is not specifically addressing the issue of training for teachers, because it is not our core area of expertise as an Association, AHISA is encouraged by the emphasis that has been placed thus far on teacher training and professional development. In our view, this is a critical element in improving student outcomes. The following are some of the factors that, we submit, should be considered.

If the measure of student performance is a standardised assessment based on a narrow view of performance rather than incorporating formative and creative measurement, the attractiveness to the profession may be lessened. In our experience, the profession is more likely to attract teachers of quality if creativity and innovation are valued and encouraged. In addition, an excessively narrow benchmark for teaching quality may adversely drive teacher behaviour in all sectors.

There are impediments to attracting and retaining quality teachers across all sectors, including school location and levels of remuneration. AHISA's member schools and their students cover the spectrum in respect of socioeconomic status, location and the level of resources available to undertake programs and practices that build a supportive culture for teachers and to foster excellence in the profession.

Quality learning

It is important that in developing measures of assessment of quality learning, an understanding of this concept should not be narrow. In particular, any focus on literacy, numeracy and science achievement, for example, should not supplant long-term educational goals by short term measures of attainment, or endanger a broad and balanced curriculum. We believe that there should be a "big picture" approach to what is quality in learning and in educational experience.

Allied with this, the privileging or prescription of particular pedagogical approaches may not be the most effective way to promote quality teaching practices or to achieve quality learning. Pedagogical practices vary across schools, cohorts of students and classes, and should be tailored to best meet the needs of particular students in a diversity of settings. The Committee may wish to consider that quality learning is largely a reflection of quality teaching and those factors that deliver quality teaching including empowered school leadership, sound pedagogy and rigorous teacher training.

Empowered school leadership

While there is a range of systems operating within the independent schools sector, by and large the sector is characterised by the localised or ‘independent’ nature of the governance of the schools within it and the operational autonomy invested by the school governing body in the principal.

Empowered leadership in the independent sector embraces a wider understanding of school autonomy than the freedom to select staff or manage budgets, and includes the operational autonomy to positively shape and lead the educational, pastoral, community, financial, spiritual, cultural and managerial practices in schools. AHISA has devoted a great deal of attention to the development and promotion of a research-based best practice model of autonomous school principalship. This model acknowledges recent international research, including that conducted by the OECD, which has shown that effective school leadership plays a key role in improving school outcomes by influencing the motivations and capacities of teachers, as well as school climate and environment.¹ In addition, research into school leadership commissioned by US-based philanthropic organization The Wallace Foundation found that the total (direct and indirect) effects of leadership are second only to teaching among school related factors in their impact on student learning, and account for around 25 per cent of total school effects.²

As noted in the *Review of funding for schooling – Final report*, among factors cited as contributing to student achievement in high-performing schooling systems are ‘using funding where it can make the most difference’ and ‘increasing school-level autonomy balanced with appropriate accountability’. These two factors meet in the role of the principal, who is uniquely positioned to ensure resources are appropriately targeted within a school. This position is supported by the Productivity Commission. In its recent report on the schools workforce, the Commission found: ‘Increased school autonomy removes impediments that can prevent principals and other school leaders tailoring school operations to best meet the needs of the local communities they serve. It thus has the potential to improve student outcomes’.³

AHISA advocates strongly that school effectiveness is supported by autonomous school principalship. If schools are to have environments conducive to high levels of student and teacher achievement, principals must have the operational autonomy to positively shape the practices of their school. It is important, then, that governments support the autonomy of school leaders. AHISA acknowledges that autonomy must be exercised within an overarching framework of agreed goals and accountabilities. However, AHISA is concerned that moves to prescription covering a range of schooling functions should be appropriately balanced with greater principal and school autonomy. In our view, there is a danger that, while seeking to empower school leaders to make decisions and implement strategies at the local level to obtain the best outcomes is a strongly desirable direction of reform, any National Plan should not undermine such positive reform through setting benchmarks for empowered school leadership that could have the effect, in essence, of limiting school autonomy through prescription.

¹ Pont, B., Nusche, D. and Moorman, H. (2008) *Improving School Leadership, Volume 1: Policy and Practice*. Paris: OECD.

² Leithwood, K., Louis, K., Anderson, S. and Wahlstrom, K. (2004) *How leadership influences student learning*. New York: The Wallace Foundation.

³ Productivity Commission (2012) *Schools Workforce*. Research Report. Canberra; page 34.

Transparency and accountability

Government accountability regimes should allow for diversity in education delivery and the autonomy of principals and schools to pursue the best educational options for their communities. It is clear that the Australian community values choice and the governance structures that are in place in independent schools require adherence to transparency and accountability, particularly where government funding is received. In addition, the choice offered ensures a rigour required to compete in the marketplace. The independent sector has always accepted its responsibility to be accountable, and it is the identification of the appropriate measures that is critical, alongside a recognition of the existing framework of accountability for independent schools, and the fact of independent schools being subject to a web of existing regulation. Independent schools in general are governed and operate in such a way that there is an inherent element of accountability to the Board of the school, and through the Board the school community.

We refer to the limitations of some measures of school performance and quality learning in our response to Section 8 – developing benchmarks and supporting improvement below. Above all, there should be a strong and proven link between the data collected and that which can make a contribution to better outcomes for students.

Meeting student need.

AHISA welcomes the focus of reform on those students with greatest need. As an Association that seeks to optimise the opportunity for the education and welfare of Australia's young people, we support any progress in improving educational outcomes for those with greatest need. The socioeconomic profile of AHISA's members' schools is diverse, with over 20 percent of members' schools with an SES score of less than 100. Consequently, this is an important issue for our members as well.

In our submission to the *Inquiry into Teaching and Learning – Maximising Investment into Australian Schools*, we referred to a research project undertaken by AHISA into leading a networked school community which indicates there is a 'relational framework' that supports the education of students in schools. The principal plays a key role in supporting this framework. In the schools of members interviewed for AHISA's project, the relational framework that is the ground for building a networked community is a tripartite partnership embracing school, parents and students. While the partnership may change shape over time, as the student matures and progresses, there is a shared common goal: the success and wellbeing of the student. This goal is interpreted through all the different aspects of schooling – curriculum, co-curriculum, pastoral care and the whole climate and culture of the school. The leader's role is to help everyone in the school community understand the foundational nature of this framework, interpret and describe it within the culture, values and ethos of the school, integrate it within the larger narrative of the school community, uphold it and model it.

Providing a quality education and good educational outcomes, then, can be improved where the influence of family members is mediated and supported by the school in a cooperative partnership, and where the school leader retains the capacity to lead a networked school community.

Section 8 Developing benchmarks and supporting improvement.

AHISA accepts that the Government wishes to put in place measures of performance of schools and school student outcomes, and that there is a requirement for tools and benchmarks to enable this assessment. At the same time, while we understand the Government's approach in instituting measures of performance, there is a risk that if there is not an allowance for a diversity of approaches, there may be substantial investment in education which does not achieve the outcomes sought.

In developing benchmarks or standards to assess the performance of schools and school students, an appraisal of school performance and student outcomes should not be limited by a narrow stratum of measurement. If specific measures and benchmarks are to be applied for the purpose of the National School Improvement Plan, we believe that there should be a "big picture" approach to what is quality in learning and in educational experience, and in what is good school performance. While there is support, for example, of NAPLAN testing for the purposes of measuring student achievement (and this should not be an exclusive measure) there is little support for the use of NAPLAN data as a measure of school performance. The use of national testing data as a proxy for the holistic success of a school and comparative reporting of this data are not adequate measures of school performance. Neither is it a forward-looking measure, either in what may emerge as meaningful measures of quality education internationally (and AHISA observes that sought-after characteristics in students are, and will continue to be, revised and challenged), or in educational outcomes in a context where schools are increasingly expected to do more, including in pastoral care and in equipping students for life after school.

With the drive to improve rankings, it is important that qualitative aspects of schooling, and factors such as the social and emotional wellbeing of students and the imparting of creative and emotional development, be included in the understanding of quality teaching and learning. By way of example, OECD analysis of PISA in respect of how the structure of schooling influences the quality and equity of educational outcomes concludes that a positive school climate is associated with better student performance. In particular, the drive to improve rankings should not be constructed in such a way that it drives or distorts school behaviour to the detriment of these elements of quality schooling. In this respect, we highlight that pressure for schools to perform in standardised testing must not be counterproductive to educational delivery and student achievement. Similarly, the adoption of a regime of standardised practices and processes, if such are to be the measures of school performance, should not be at the expense of the flexibility to adopt diverse approaches.

AHISA is strongly supportive of the Bill's intent that Governments of States and Territories, non-government education authorities and other partners work with the Commonwealth government to implement arrangements to support gathering and sharing evidence about the most effective methods of improving the performance of schools and school student outcomes. An enhanced evidentiary basis for improved educational outcomes will have a positive effect across all sectors, and we believe that the sharing of best practice will have positive effects for schools in all sectors.

Conclusions

AHISA is of the view that the focus of reform should be on understanding what can be done (and what is currently being done) in a practical way to improve outcomes in schools, and what can be replicated and reproduced across all sectors. Positive school engagement in the reform directions outlined by the Government can come from a strategy that is sufficiently flexible and adaptive to evaluate, at a school



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level, any issues relating to quality teaching and learning and capacity to meet student need, and to then identify positive strategies to address these issues in a concrete (and costed) way.

In general, AHISA suggests that the Government considers a benefit test for the imposition of any additional regulation, prescription or benchmark associated with reforms. Such a benefit test should include:

- how does the regulation impact on existing practices (both positive and negative);
- how does the regulation promote positive reform and the adoption of good practice;
- what may be the negative effects of such regulation, including the additional cost of compliance and the limiting of innovation and autonomy on the part of schools and school leaders;
- in particular, given the criticality of building the capacity of the teaching profession to achieve good educational outcomes, does any prescription result in the loss of professional flexibility, creativity and autonomy.

Thank you for the opportunity to provide our initial comment on the *Australian Education Bill 2012*. AHISA would welcome the opportunity to participate in any hearings that are to be held by the Committee.

Yours faithfully,

Kim Cull

Chief Executive Officer
Association of Heads of Independent Schools of Australia

About AHISA

The membership of AHISA comprises principals of some 410 independent schools with a collective enrolment of approximately 400,000 students, representing 11 percent of total Australian school enrolments and 20 percent of Australia's total Year 12 enrolment. The primary objective of AHISA is to optimise the opportunity for the education and welfare of Australia's young people through the maintenance of collegiality and high standards of professional practice and conduct amongst its members.

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