

RESPONSE TO THE QUEENSLAND GOVERNMENT EDUCATION GREEN PAPER *A FLYING START FOR QUEENSLAND CHILDREN*

June 2010

1. INTRODUCTION

Independent Schools Queensland (ISQ) is the peak state body representing the independent schools sector. It represents a sector with 200 schools and around 108,000 students, accounting for 15 per cent of Queensland school enrolments.

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 particular educational philosophy or interpretation of mainstream education.

Independent schools include:

- Schools affiliated with larger and smaller Christian denominations for example, Anglican, Catholic, Lutheran, Uniting Church, Seventh Day Adventist and Presbyterian schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as the grammar schools
- 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 risk factors.

Independent schools are not-for-profit institutions founded by religious or other groups in the community and are accredited by the Non-State Schools Accreditation Board. 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 the Lutheran systems.

2. THE GREEN PAPER

The Education Green Paper *A Flying Start for Queensland Children* was released on 2nd February 2010 for public consultation. The Green Paper outlines three objectives under three sections.

Getting ready for school

Objective 1- improving children's development, wellbeing and school readiness

Getting ready for secondary school

Objective 2 – improving transitions from primary to secondary school and supporting adolescent development

Boosting high performance for all schools

Objective 3 – improving school discipline and the quality of teaching and setting high performance standards for all schools

A number of strategies or initiatives are identified in relation to each objective. This response addresses those proposed strategies.

In addition to this response, Independent Schools Queensland will continue to provide feedback through its membership of a number of reference groups established in relation to the Green Paper. These include the *A Flying Start Advisory Group*, the *Year 7 Reference Group*, and the *Review of Teacher Education and Induction Reference Group*.

3. GETTING READY FOR SCHOOL

The key strategies proposed are the introduction of a kindergarten year for all children; encouraging families to read to their children; and enlisting an army of volunteer Queensland Ready Readers in primary schools

3.1 Introduction of kindergarten year for all children

The low participation rate of Queensland children in kindergarten compared with some other States/Territories is well documented¹, as are the educational benefits of children undertaking a structured program in the year before the Preparatory Year².

For these reasons, Independent Schools Queensland strongly supports initiatives that will result in all Queensland children being able to participate in a kindergarten program in the year prior to the Prep Year.

Initiatives such as the provision of an extra 240 kindergarten services on school sites by 2014 are particularly supported, as is the replacement of DECKAS funding with recurrent funding for all eligible kindergarten providers.

The independent schooling sector has a long history in the successful provision of kindergarten and early childhood services, with many independent schools already providing kindergarten (most of which do not currently receive government funding).

¹ As stated in the Green Paper, currently only 29 per cent of kindy-aged children attend a kindergarten program in Queensland, compared with 80 to 95 per cent in other states and territories.

² See, for example, the outcomes of the recent Australian Education Development Index.

Independent schools are well placed to significantly contribute to the Government's initiative of providing a kindergarten year for all children.

3.1.1 What else could help?

There are considerable regulatory obstacles standing in the way of schools providing kindergarten or child care at a school location as part of an integrated provision.

Independent schools are willing and able to co-locate kindergartens on their sites and to facilitate this, Independent Schools Queensland would suggest that the Government review and improve the intersection of school and child care legislation to create a regulatory environment that enables schools to provide kindergarten and early childhood services in an integrated manner.

In relation to the additional 240 kindergarten services proposed for Queensland, there should be a clear and transparent process in the allocation of such services to school sites. This would be best achieved through an "expression of interest" process, allowing all schools to indicate their interest and preparedness to participate in the provision of new kindergarten services.

3.2 Encouraging families to read to their children and Volunteer Ready Readers

Independent Schools Queensland notes that an awareness campaign is currently being conducted to encourage parents and carers to read to their children regularly.

Any measures which encourage parents and carers to read to their children are welcomed for the potential significant benefits they will have on ensuring children are better prepared for school.

Independent Schools Queensland welcomes the opportunity for independent schools to be involved in the Queensland Ready Readers.

At the centre of the ethos and philosophies of independent schools are strong relationships with parents and the community. In this regard, the majority of independent schools already have in place for parents, grandparents and other community member's mechanisms for involvement in school, including volunteer programs to assist children in their educational program.

4. GETTING READY FOR SECONDARY SCHOOL

The key strategy proposed is the movement of Year 7 from primary to secondary school.

4.1 Year 7

Independent Schools Queensland supports the movement of Year 7 to secondary schooling in 2014, subject to sufficient support being given to all schools as a result of such a change.

The independent schools sector is well placed to make the change. About 70% of the 200 independent schools in Queensland already provide Prep to Year 12 and in fact, there are many examples in independent schools where Year 7 is already part of the secondary provision. Further, many independent schools provide middle schooling as an effective mechanism to improve the transition from primary to secondary.

The educational benefits of the move of Year 7 are well recognised. With the introduction of the Prep Year in 2007, all students will have had the opportunity to complete eight years of primary schooling under the current arrangements.³ Prior to the introduction of the Prep Year, many independent schools provided a pre-school year, meaning that many students in independent schools were already completing eight years of primary education. This has been a driver for independent schools already placing Year 7 into secondary or the introduction of middle schooling.

The move of Year 7 to secondary would bring Queensland into line with the majority of other States/Territories and will better match school provision in Queensland with the new Australian Curriculum to be implemented from 2011.

In making the Year 7 change, recognition and support must be given to a number of complex issues for all schools.

The notion that P-12 schools will be easily able to handle the change and will not require assistance must be rejected. For many such schools, Year 8 is currently a major intake year. For example, a P-12 school may move from a two or three stream primary provision, to a four or five stream secondary provision.

Feedback from independent schools has identified the following areas of support are required.

For Primary Schools

- Assistance for primary schools to expand into middle schooling or secondary provision where they choose to do so – this should include financial assistance for the provision of facilities and streamlined accreditation processes.
- Recurrent assistance where staffing changes are required as a result of the move of Year 7 (for example, redundancies).
- Recurrent assistance for very small primary schools which have composite classes particularly at the upper secondary level.
- Assistance for primary schools to introduce kindergarten services as a means of not only boosting this provision throughout the state, but ensuring viability of primary schools.

For Secondary Schools

- Financial assistance for the provision of additional facilities to accommodate Year 7.
- Streamlined accreditation processes for the inclusion of Year 7 as an attribute of accreditation.
- Recurrent assistance to ensure appropriate pastoral care and transition strategies are in place.

³ Although the Prep Year is not compulsory, participation is close to universal with about 98% of children undertaking Prep.

For P-12 and P-10 Schools

- Financial assistance for the provision of additional facilities to accommodate Year 7 into secondary or middle schooling.
- Recurrent assistance to ensure appropriate pastoral care and transition strategies are in place.

For Boarding Schools

- Financial assistance for the provision of additional boarding facilities⁴.
- Financial assistance for Year 7 parents to meet the additional cost of boarding for that year.

For Schools That Have Already made the Move

- Early recognition (ie prior to 2014) of this fact, enabling these schools to receive appropriate Australian and Queensland Government recurrent secondary funding for Year 7⁵.

General Support for Secondary Schools

Much of the discussion in relation to the movement of Year 7 has centred upon the additional facilities that will be required in secondary schools. This is significant; however, the educational and professional support that schools will require in relation to the move must also be recognised.

Feedback from independent schools that have already made the move would suggest that schools will need to pay particular attention to issues such as pastoral care arrangements, expectations of students and teachers, realignment of teaching programs and other matters to ensure that the move of Year 7 results in improved educational outcomes.

Further, current Year 7 teachers do not normally have specific subject expertise. This issue will need to be addressed in the movement of Year 7 to secondary.

4.2 How to Determine the Costs and Allocate Support

Financial and professional support for all schools will be essential in ensuring a successful move of Year 7 to secondary.

For capital assistance, Independent Schools Queensland recommends the model used to determine funding support for the introduction of the Prep Year be utilised in respect of Year 7. This involved a state-wide audit of all schools and the determination of funding assistance to the schooling sectors based on that audit. In the independent sector, ISQ's Block Grant Authority would be the mechanism through which to allocate appropriate funding to individual schools.

⁴ Currently there are 31 independent boarding schools in Queensland, with data showing that many do not have any capacity to accommodate additional students. In these schools, additional facilities will be required for Year 7 boarding students.

⁵ Many of these schools are already facing the costs of providing a secondary provision for Year 7, yet still only receive Government funding at the primary education rates. For some of these schools, the current financial arrangements have an impact on the school's assessment under the Australian Government Financial Health Assessment Framework.

The Queensland Government should also ensure that the provision of facilities for the transfer of Year 7 to secondary can be undertaken efficiently. In this regard, the Government should take the opportunity to relax development regulations for year 7 facilities. The amendment of planning regulations in relation to the Building the Education Revolution Program provides an appropriate model to ensure Year 7 facilities are provided efficiently and in the required timeframe.

Independent Schools Queensland would assist independent schools with implementation issues, particularly in relation to pastoral care and educational programs. Financial assistance from the Government to support this role would be appropriate.

Further, independent schools would be happy to work closely with the other schooling sectors in the educational matters associated with the move, sharing experiences and models and assisting with the development of appropriate professional support packages.

5. BOOSTING PERFORMANCE FOR ALL SCHOOLS

The strategies proposed under this section include having high expectations of students, teachers, schools and our system of education and ensuring they get the support they need; lifting the quality of teaching training courses provided by universities, and the support teachers receive when they first start teaching; improving support for teachers undertaking their school placements during their training; and establishing an independent education authority to set and monitor common standards for teachers and all schools.

5.1 Review of the quality of teacher training courses and the support provided by schools to beginning teachers

Independent Schools Queensland notes that there have been a number of reviews, at both the Commonwealth and State level of teacher training courses over recent years. It is also noted that as a result of the Masters' Review of the Queensland Education system, there are initiatives being taken such as pre-registration tests for beginning teachers.

Independent schools provide strong feedback about the quality and readiness of beginning teachers indicating that there is a need for reform in teacher training courses.

Independent Schools Queensland supports a review of teacher training courses. It has recently made a submission to the established group undertaking this task. Independent Schools Queensland is a member of the reference group established in relation to this matter and through that group will continue to provide feedback and input into the Review. Further, ISQ will be engaging with the Review leaders on a regular basis.

5.2 Teaching Centres of Excellence

The proposal to create five Teaching Centres of Excellence, based in key schools across the state, to give student teachers a solid foundation in their teacher training placements is noted. Although not recognised in the Green Paper, Independent Schools Queensland, through the *Smarter Schools National Partnership on Quality Teaching*, is also facilitating the establishment of a number of Teaching Centres of Excellence in independent schools.⁶

⁶ In 2010, Teaching Centres of Excellence will be established in the following independent schools – Brisbane Girls Grammar School, Cannon Hill Anglican College, Forest Lake College, and Trinity Lutheran College.

The models utilised for these Centres, along with the processes and operations will be shared across the schooling sectors. Independent Schools Queensland is confident that the Centres established in independent schools will make a significant contribution to improving teacher training placements.

5.3 Independent Standards Authority

The Green Paper proposes that one body be responsible for the standards for teaching and schools, and that authority would connect the standards for curriculum, teaching and schools. This would be achieved by amalgamating the current three statutory education authorities in Queensland – the Queensland College of Teachers (QCT), the Queensland Studies Authority (QSA) and the Non-State Schools Accreditation Board (NSSAB), into one authority.

Independent Schools Queensland does not support the establishment of one single standards authority in Queensland. It believes achieving high performance standards for all schools can be achieved through the improvement of the existing authority structures.

There is no evidence presented in the Green Paper (nor has there been any evidence coming forward since the release of the Green Paper), that a single standards authority would contribute to improving educational outcomes in Queensland. Further, no evidence is presented to suggest that a single authority would operate more efficiently than the current arrangements.

There are a number of factors which have contributed to ISQ's conclusions on this matter.

Weller Review

The recent (2009) Weller Review of Queensland Statutory authorities considered the existing three statutory authorities (including the Non-State School Eligibility for Government Funding Committee as part of NSSAB).

The Review considered the role and functions of each of the authorities against a Public Interest Map and concluded that each of the authorities should be retained (Recommendation 179 in relation to QCT; Recommendation 184 in relation to NSSAB and the NSSEGFC; and Recommendation 185 in relation to QSA).

In relation to QSA, the Review noted "pending decisions for national curriculum reform" and commented on the respective roles of the Department of Education and its education portfolio bodies concerning curriculum activities.

The Government's response to the Weller Report supported its Recommendations 179, 184 and 185, namely retaining the status quo in relation to QCT, QSA and NSSAB.

Roles, Culture, Governance and Resourcing

The three existing statutory authorities – QCT, QSA and NSSAB, have significantly different roles, cultures, governance and resourcing provisions. Any amalgamation of the three bodies would be difficult to comprehend in relation to these differences.

For example, the current governance of both QCT and QSA is based on a representative model, whereas NSSAB is a more expert based Board; QCT is funded by teachers directly; and both QSA and QCT have considerable staffing numbers as compared to NSSAB. In 2009, QCT had revenue of \$7.2

million with 49.2 FTE staff; QSA's revenue was approximately \$41 million with a staff of 235.2 FTE; whilst the NSSAB's revenue was approximately \$300,000 with 6.5 FTE staff.

QCT's core functions relate to teachers as a profession, whereas QSA and NSSAB deal with matters relating to schools.

In particular, ISQ would be concerned that the role and responsibilities of the NSSAB would be "lost" in an amalgamated body, given the functions and resourcing of QCT and QSA as compared to NSSAB.

Queensland College of Teachers

QCT has a very specific and defined function in relation to teachers (as opposed to schools) and is funded by the teaching profession. It undertakes its functions efficiently and is well accepted by the teaching profession. Further, its current role and structure is well supported by the independent schooling sector.

For these reasons, ISQ concludes that it should remain as a separate independent statutory authority.

There is potential for there to be a higher level of formal co-ordination and information sharing between QCT and the other statutory bodies (although ISQ would argue that such information sharing and co-ordination already exists, albeit in a less formal manner).

The Non-State Schools Accreditation Board

The current NSSAB and associated accreditation requirements for non-state schools were introduced in 2002 and have been fully supported by non-state schools. Upon their introduction, the then Minister for Education, and now Premier, the Hon Anna Bligh, described the accreditation system for non-state schools as "light touch" and 'enabling'.

The non-state schools accreditation requirements have proved to be successful, meeting the objectives of the *Education (Accreditation of Non-State Schools) Act 2002*, namely

- to uphold the standards of education at non-state schools;
- to maintain public confidence in the operation of non-state schools;
- to foster educational choice in the State; and
- to provide the basis for the efficient allocation of Government funding for non-state schools.

NSSAB undertakes its functions very efficiently and has developed expertise in the accreditation of non-state schools, the issues facing non-state schools and the governance and management of non-state schools.

This knowledge and appreciation of the complex issues facing non-state schools could be potentially lost in an Independent Standards Authority, particularly one that would be dealing with the significant issues of teacher registration, state school accreditation and curriculum, assessment and reporting issues.

The Non-State Schools Eligibility For Government Funding Committee operates under the NSSAB. The Green Paper does not include any reference to the arrangements that would apply under an Independent Standards Authority in relation to the functions of this Committee.

ISQ does not support the NSSAB functions being incorporated into a single standards authority. Whilst accepting that high standards must apply to all schools, it is not appropriate to have one model applying to all schools in order to demonstrate high standards.

The NSSAB has a legislative objective to “foster educational choice in the State”. ISQ believes this objective is fundamental to the maintenance of an education system that provides choice and diversity for parents. ISQ would not accept any proposal which diluted this objective and contends that the language used in the Green Paper alludes to the potential for such a position.

References to the independent standards authority having a mandate “to undertake school inspections” raises the possibility of a “one-size-fits-all-approach”, as compared to the current NSSAB cyclical review requirements whereby non-state schools are encouraged to celebrate their diversity and difference, within a framework of quality assurance and high standards.

Further, the considerable investment that individual independent schools and their supporting organisations (such as the Associated Christian Schools Association and the Lutheran Education Office) have made in developing and implementing review processes could be lost. These processes have served the independent schooling sector well, and through it Queensland education.

Queensland Studies Authority

QSA currently provides an independent mechanism to govern curriculum development, assessment and reporting in Queensland.

QSA receives strong support from the independent sector principally due to the direct involvement of the independent sector in the work and functions of QSA.

The impact of the Australian Curriculum and the establishment of ACARA on the role and functions of QSA must be acknowledged, however, it is clear, there will continue to be a need for an independent State body to conduct assessment, certification and reporting.

In view of the introduction of the Australian Curriculum and the establishment of ACARA, there is a need to review the role and functions of QSA. There is also a need to ensure that QSA is properly resourced in order to assist and guide schools in the implementation the Australian Curriculum.

Accreditation of State Schools

The Green Paper outlines that state schools would have to be accredited, like non-state schools and that there would be a common accreditation process that all schools would undertake.

Whilst the operation and management of state schools is a matter for the Department of Education and Training, ISQ does not have an issue with the accreditation of state schools.

However, ISQ does not believe it is in the best interests of Queensland education, not is it appropriate, that the same accreditation processes apply to state and non-state schools. Further, ISQ strongly believes that the accreditation processes for state and non-state schools should not be achieved through one single body. A “one-size-fits-all” approach would be detrimental to the Queensland education system.

The application of current accreditation requirements for non-state schools to state schools would involve a number of unusual circumstances. For example, would the Minister for Education be the subject of show cause and compliance notices as the owner and operator of a state school where the school failed to meet accreditation criteria? Would the Government need to gain the approval of the accreditation authority for the establishment and funding of a new state school, including consideration of its impact on existing schools?

The above examples illustrate that it would not be appropriate to apply the current accreditation criteria for non-state schools to state schools. ISQ would be concerned if there was a single accreditation authority, that over time, the accreditation criteria would be driven by the needs and circumstances of state schools and that the well-developed specific processes for the accreditation of non-state schools would be lost.

Accreditation Processes for State and Non-State Schools Should Reflect their Governance and Management Arrangements

The governance and management of non-state schools and state schools is totally different from that of state schools. To be effective, accreditation processes and requirements must reflect those differences.

In the independent sector, school autonomy is a powerful driver of school improvement and performance. This is supported by considerable research findings.

The autonomy and independence of independent schools is fundamental to their existence and their ability to meet the needs of their communities. ISQ would be concerned about the impact of a single standards authority on the autonomy and independence of independent schools.

It is recognised that independent schools need to be accountable and need to achieve high standards. Independent schools accept significant government funding and the taxpayer is entitled to know their funds are being used effectively and efficiently in the best interests of educational outcomes for children.

In this regard, independent schools are already subject to multiple layers of accountability, including Australian and Queensland Government requirements. Most importantly, independent schools are subjected to perhaps the ultimate accountability – that of fee paying parents. It is the needs of parents and the community that drives the performance and quality of independent schools.

Further, ISQ would contend that school improvement and excellent educational outcomes in the independent sector is the rightful responsibility of school governing bodies and school leaders. We should have great confidence in the ability of education professionals – our Principals and school leaders, to drive the operation and management of schools, including improvement processes.

In the independent sector, it is school governors, Principals and other leaders that will ultimately make a difference and drive school improvement and quality outcomes. ISQ does not believe that the creation of an Independent Standards Authority, as a centralised bureaucracy, provides a suitable alternative to local autonomy in ensuring high standards and school improvement.

5.4 An Alternative Approach

Whilst ISQ rejects the proposal for an Independent Standards Authority through the amalgamation of QCT, QSA and NSSAB, it does contend that we should take the opportunity to review and reform

the existing statutory authorities where appropriate. Continuous improvement in the roles and functions of regulatory bodies will always be necessary.

The role and work of the QSA will in particular need to be reviewed in light of the Australian Curriculum and the role and functions of the recently established Australian Curriculum Assessment and Reporting Authority (ACARA).

Further, there are significant changes currently happening in the architecture of education bodies at the national level. Not only do we have the establishment of ACARA, but also the Australian Institute for Teaching and School Leadership and Education Services Australia.

The establishment of these national authorities will impact on the work and functions of QCT and QSA in particular.

5.4.1 NSSAB

Since the establishment of NSSAB in 2002, the Board itself, with the support of the non-state schooling sectors, has recommended a range of legislative amendments to the *Education (Non State Schools Accreditation) Act and Regulations* designed to improve and update the processes involved in the accreditation and funding approval for non-state schools.

To date, these proposed amendments have not been progressed.

ISQ recommends that the Government give due consideration to the progression of previously proposed amendments to the accreditation legislation which are intended to improve the accreditation processes for non-state schools.

5.4.2 QSA

In the current environment of the introduction of the Australian curriculum, QSA requires strong leadership, appropriate resourcing and a clearly defined role to ensure that it continues to serve the Queensland education system.

In this regard, the Government should re-consider the recommendations of the Meade Review of QSA undertaken some years ago. The Meade Review involved a number of significant recommendations in relation to the governance and operation of QSA; recommendations which have not been progressed to date.

5.4.3 Information Sharing and Connecting the Standards for Curriculum, Teaching and Schools

ISQ recognises the need for there to be appropriate connections between the standards for curriculum, teaching and schools, including information sharing between the relevant statutory authorities.

ISQ would contend that such connections are already being made, both at the local level through school leaders, and at the policy level, through the currently excellent relationships between the schooling sectors and statutory bodies.

There may be a case for a more formal approach than currently exists in making these connections.

Within the existing education structures, there are mechanisms whereby such formal approaches could be implemented without creating new structures, particularly those of a bureaucratic nature.

ISQ would recommend that the Government give consideration to using the existing relationships and structures within the education sector to overcome any perceived lack of information sharing or connections between the standards for curriculum, teaching and schools.

6. CONCLUSION

Independent Schools Queensland appreciates the intent of the objectives and strategies outlined in the Green Paper – *A Flying Start for All Queensland Children*.

In the context of the current arrangements for schools in Queensland and the proposed strategies outlined in the Green paper, Independent Schools Queensland –

- Supports initiatives that will result in all Queensland children being able to participate in a kindergarten program in the year prior to the Prep Year;
- Welcomes any measures which encourage parents and carers to read to their children for the potential significant benefits they will have on ensuring children are better prepared for school;
- Supports the movement of Year 7 to secondary schooling in 2014, subject to sufficient support being given to all schools as a result of such a change;
- Supports a review of teacher training courses;
- Does not support the establishment of one single standards authority in Queensland;
- Believes achieving high performance standards for all schools can be achieved through the improvement of the existing authority structures;
- Recommends that the Government give due consideration to the progression of previously proposed amendments to the accreditation legislation which are intended to improve the accreditation processes for non-state schools;
- Believes the Government should re-consider the recommendations of the Meade Review of QSA; and
- Recommends the Government give consideration to using the existing relationships and structures within the education sector to overcome any perceived lack of information sharing or connections between the standards for curriculum, teaching and schools.

**Independent Schools Queensland
June 2010**