



Independent Schools
Council of Australia

LT059/11

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

Thank you for the opportunity to make a submission to the Committee's Inquiry into the Schools Assistance Amendment Bill 2011.

Background

The Independent Schools Council of Australia (ISCA) is the peak national body covering the independent schools sector. It comprises the eight state and territory Associations of Independent Schools. Through these Associations, ISCA represents a sector with 1,090 schools and around 550,000 students, accounting for nearly 16 per cent of Australian school enrolments. ISCA's major role is to bring the unique needs of independent schools to the attention of the Commonwealth Government and to represent the sector on national issues.

Independent schools are not-for-profit institutions that are set up and governed independently on an individual school basis. Independent schools are registered with the relevant state or territory education authority. Boards of governors or committees of management are the key decision-making bodies for most independent schools and are responsible for issues such as a school's educational provision, current and future development and staffing. Unlike other sectors, the majority of independent schools operate autonomously. These schools do not rely on central bureaucracies or bodies and are separately accountable to their parent and school communities.

Some schools with common aims, religious affiliations and/or educational philosophies also belong to systems within the sector. This means that some operational functions are carried out by the system on behalf of all schools within the system. Systemic schools account for 17 per cent of schools in the independent sector.



Many independent schools have been established by community groups seeking to meet particular needs. Examples include the independent community schools for indigenous students in remote areas, special schools for students with disabilities and boarding schools to educate children from rural and remote areas. There are also schools that seek to reflect the religious values of a particular community or that seek to practice an internationally recognised educational philosophy such as Rudolf Steiner or Montessori schools.

School enrolments and trends

The independent school sector is the fourth largest school education provider in Australia and at secondary level is the largest provider of schooling services.¹ Enrolments in independent schools have grown steadily since the 1970s. According to Australian Bureau of Statistics (ABS) data, in 2010 independent schools accounted for 14 per cent of total student enrolments compared to 4 per cent in 1970². Full time enrolments have increased from around 114,000 in 1970 to over 491,000 in 2010.

Australian Curriculum

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 that 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 timing of the implementation of the national curriculum therefore directly impacts on individual independent schools through their Funding Agreements.

The independent sector acknowledges that implementation of the Australian Curriculum will need to be undertaken in a phased manner in order to ensure time for appropriate consultation and a high standard outcome. Appropriate consultation is particularly important for the independent sector which incorporates a diversity of schools many of which offer alternative curricula. These schools provide students and parents with the opportunity to choose a school with a philosophy and curriculum which best meets their particular needs. It is critical to these schools that their particular circumstances be accommodated in the development of the Australian Curriculum.

Phase one of the Australian Curriculum has now been endorsed by MCEECDYA. A three year implementation period has been agreed for this phase commencing in 2011, with substantial implementation by the end of 2013. However, phase two, covering the learning areas of languages, geography and the arts, is still under development. A third phase will be required to cover the remaining learning areas identified in the Melbourne Declaration on Educational Goals for Young Australians.

Of particular note is the issue of curriculum for the senior secondary years. It is widely acknowledged that work is just commencing in this area and it is anticipated that development of a national curriculum for these years may require significant time for agreement and consultation.

¹ ABS *Schools, Australia 2010* and Non-Government School Census 2010 – independent sector figures include independent Catholic enrolments

² ABS data excludes independent Catholic enrolments

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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.

Questions concerning the alignment of existing assessment and reporting standards in the senior secondary years, which are currently the responsibility of jurisdictional curriculum authorities, with those to be developed by ACARA for the Key Learning Areas have yet to be adequately resolved.

There are also concerns about the ability of state and territory accrediting authorities to meet their obligations to have the senior secondary curriculum ready for implementation from 2014. Jurisdictional accreditation for senior secondary curriculum has traditionally been a rigorous process that takes considerable time which makes it unlikely that the Key Learning Areas would be accredited before the end of 2014.

This amendment also acknowledges that the Australian Curriculum will be a dynamic resource. The current legislation does not recognise that from time to time refinements and improvements, revisions and additions will be required.

The independent sector is also concerned to ensure consistency in Australian Curriculum implementation requirements across both government and non-government schools. As well as curriculum content, appropriate consultation is required prior to the development of regulations prescribing the curriculum implementation timeframes.

The Explanatory Memorandum states that it is proposed that regulations to prescribe the curriculum implementation timelines be authorised by the Standing Council. The non-government school sector does not have specific representation on the Standing Council or on its advisory officials' committee, the Australian Education, Early Childhood Development and Youth Affairs Senior Officials Committee (AEEYSOC). The independent sector is seeking assurance that non-government schools will be adequately and appropriately consulted regarding implementation timeframes prior to the development of regulations.

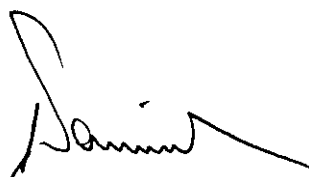
Support for implementation

ISCA would like to highlight the importance of ensuring that schools are provided with appropriate support and assistance to implement the Australian Curriculum. Currently there is no agreed or consistent approach across or within jurisdictions to ensure that all schools are receiving the support required to implement the Australian Curriculum, particularly in the area of teacher professional learning.

Conclusion

The independent sector agrees that the current timeframe specified in the legislation is not appropriate and does not allow the necessary flexibility for the phased approach to the implementation of the Australian Curriculum. The proposed regulations should be framed to ensure appropriate flexibility in the timeline for the implementation of the Australian Curriculum. The non-government school sector, including at the state and territory level, should be extensively consulted on all aspects of the implementation of the Australian Curriculum including implementation timeframes.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Daniels', with a long horizontal flourish extending to the right.

Bill Daniels
Executive Director