

A PATHWAY TO

BETTER, SMARTER REGULATION

FOR CATHOLIC SCHOOLS
IN NSW



CONTENTS

Executive Summary	2
Summary of Recommendations	4
The Purpose of Better, Smarter Regulation	5
Why Regulatory Reform?	6
Principles for Better Regulation	9
Priorities for reform	10
Teacher accreditation	10
Nationally Consistent Collection of Data (NCCD) on students with disability	14
School governance	16
Financial compliance	18
Other opportunities for reform	21
Vocational Education & Training	22
School curriculum and school reports to parents	23
School Annual Reports	24
NESA School Registration Manuals	24
COVID-19 Opportunities	25
School based assessment for Stage 6	25
Major projects: moving from external marking to teacher marking of projects	25
Music, Dance and Drama	25

EXECUTIVE SUMMARY

Catholic Schools NSW (CSNSW) designed *Better, Smarter Regulation* to assess the incidence and burden of regulation with respect to school principals and teachers and to identify proposals for government to lighten this burden.

Teachers and principals have consistently reported that compliance requirements take precious time away from teaching. Teacher workloads have increased because of this compliance burden, despite additional resources and more support staff. This report, developed through a programme of consultation, seeks to address this burden and recommends solutions that will allow more time for teachers and principals to focus on their students.

This document has the benefit of insights from a wide group of professionals and key stakeholder groups. These include Catholic Diocesan education offices, school principals and teachers from systemic and non-systemic Catholic schools, inter-diocesan policy advisory and reference groups, the NSW Association of Catholic School Principals, and the Federation of Religious Institute and Ministerial PJP Schools in NSW and ACT.

CSNSW also engaged the Independent Education Union (NSW), who has provided valuable input.

These consultations have been supplemented by research into 'best practice' regulation, as well as research on the workplace health of principals.

The discussion and investigation of these issues also leverages the policy changes introduced by the NSW Educational Standards Authority (NESA) during the COVID-19 pandemic. This report explores these temporary changes and considers the merits of several changes being permanent.

While the consultation process identified a number of issues with the current school regulatory environment, this report identifies four priority areas for reform. These are priority areas of reform because they are the identified areas that can deliver the most significant reduction in the compliance burden for schools.

The findings and recommendations of *Better, Smarter Regulation* seek to provide government and its agencies with a pathway to reform in these priority areas:

- 1 **Teacher accreditation:** Simplifying the pathway to teacher accreditation while continuing to improve teacher quality.
- 2 **Financial compliance:** Supporting better financial accountability through streamlining financial reporting.
- 3 **Nationally Consistent Collection of Data (NCCD) on Students with Disability:** Promoting better support for students with disability by giving teachers more time to focus directly on students.
- 4 **School governance:** Better supporting school principals by providing more time to focus on the core mission of schools.

The consultation process also identified that changes to the school curriculum and school reports to parents, Vocational and Education Training (VET), school annual reports, and school registration manuals, would reduce the compliance burden for schools.

To assist Governments to pursue reform in these areas, *Better, Smarter Regulation* provides clear recommendations on how to reform each of these areas.

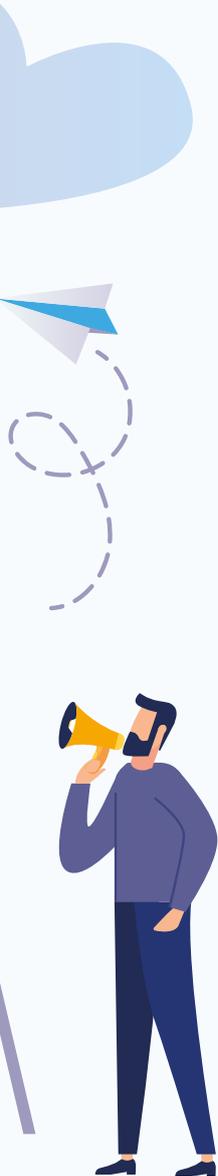
These recommendations are informed by best practice principles that shape efficient and effective regulatory systems. They identify a more proportionate, flexible and adaptable regulatory approach that maintains a strong emphasis on professionalism, transparency and accountability.



SUMMARY OF RECOMMENDATIONS

CSNSW RECOMMENDS:

1. The NSW Department of Education undertakes a project to consider consolidating the three NSW Acts regulating schooling, being the *Education Act 1990*, the *Education Standards Authority Act 2013*, and the *Teacher Accreditation Act 2004*, into a single schools statute, giving better guidance to the regulated population.
2. The Commonwealth and NSW Education Departments should implement ongoing initiatives to assess the impact and utility of existing and new regulations on schools.
3. NESA moves to simplify teacher accreditation processes and better support teacher quality.
4. The Commonwealth Department of Education, Skills and Employment considers changes to the NCCD administrative requirements and simplifies reporting protocols.
5. NESA and the NSW Department of Education redouble efforts to reduce the compliance and regulatory-related workload of school principals by simplifying the regulatory experience in schools.
6. The Commonwealth and NSW Governments streamline financial reporting requirements, while ensuring that transparency and accountability are maintained.
7. DESE and ASQA seek early consideration and implementation of the recommendations of the 'Rapid Review of the Australian Skills Quality Authority's Regulatory Practices and Processes'.
8. NESA and ASQA review professional development for accredited VET teachers to identify and compare professional development requirements against non-VET teachers.
9. The Commonwealth Government seeks to simplify oversight of student reports and grant schools increased, permanent flexibility as to how they report on student achievement and progress.
10. NESA clarifies the difference between advisory information and the explicit 'requirements' for teaching programmes.
11. NESA considers making permanent the changes introduced in response to COVID-19, including giving principals the authority to decide which syllabus outcomes and content they teach and assess for Kindergarten to Year 10 in 2020.
12. NESA removes the current requirement for schools to produce an annual report, noting essential information required for transparency of school operations is already publicly available through My School.
13. NESA removes ambiguity around the status of 'advisory information' for schools, clarifying what is advisory information and what is a compliance requirement.
14. NESA examines the benefits of maintaining the changes granting discretion to principals and system authorities to determine the number, type and weighting of tasks for HSC and Preliminary Course (Year 11) school-based assessment.
15. NESA explores whether there is support for, and merit in, maintaining on a permanent basis, the reallocation of responsibility for the marking of major project components of Design and Technology, Industrial Technologies, Textiles and Design, and Visual Arts, away from external HSC markers to school teachers.
16. NESA examines the merits of maintaining, on a permanent basis, the simplification of assessment processes for music, dance and drama, introduced in response to challenges presented by COVID-19.



THE PURPOSE OF BETTER, SMARTER REGULATION

CSNSW is committed to advocating for a legislative and regulatory framework that supports quality teaching and successful learning environments. Through well founded advocacy to government and regulators, CSNSW seeks to promote the optimal settings for our schools and systems to support them to be more effective in core activities.

NSW schools perform a unique and pivotal role, supporting children to become successful lifelong learners and active members of the community. Understandably, education is a sector that requires considered oversight. There is a regime of detailed regulation in place to support the operations of schools and the development of staff across areas such as school registration, child protection, teacher accreditation, assessment, curriculum, and reporting.

CSNSW seeks to promote the optimal settings for our schools and systems to support them to be more effective in core activities.

However, over recent years, an increasing number of voices across school sectors—government, Catholic and independent—have called for changes to a growing regulatory burden. School principals and teachers report that their core aims of teaching and learning are being overrun by red-tape and compliance related work.

If compliance and administrative burdens are a barrier to principals and teachers focusing on their core work of teaching and learning, regulatory changes must be considered and implemented.

Recent reviews, such as the Australian Senate Select Committee on Red Tape's review of 'The effect of red tape on private education' and the NSW Government's 2016 review of the then Board of Studies, Teaching and Education Standards (BOSTES), aimed to identify and ameliorate the weight of regulation. The NSW Education Standards Authority (NESA) has also identified regulation as needing review and reform. In 2007, the Commonwealth, State and Territory Governments, meeting as the Council of Australian Governments (COAG), also agreed to *Principles for Better Regulation*. These Principles are still in force, but it is arguable whether they are closely followed in practice.

Despite these successive reviews and policies, the regulatory load on school leaders and teachers continues to grow. The 2016 review of BOSTES identified that regulatory processes were administratively burdensome for schools, teachers, employers, and for BOSTES itself.¹ While the review of BOSTES recommended changes, the problem remains.

This observation is not limited to regulatory reviews of regulation focused on schools. The Final Report of the 2017 *Independent Review of the NSW Regulatory Policy Framework* found that "NSW Government initiatives to reduce red tape were not effective".²

In undertaking this work, CSNSW seeks to support the objectives of the Federal Government as per its education policy for the 2019 election:

"Pursuing a Council of Australian Governments Education Council review to lift the burden of compliance and red tape, so teachers can focus on teaching, not paperwork."

(Liberal Party of Australia, Election Policy 2019).



CSNSW is also aware of the Australian Institute for Teaching and School Leadership (AITSL) 'Review to Reduce Red Tape for Teachers and School Leaders', which is looking at the existing and potential approaches being adopted by schools and jurisdictions to reduce red tape for teachers and school leaders. To this end, the AITSL review will:

- Identify Commonwealth and State and Territory compliance and administrative requirements that are experienced by schools.
- Advise on practices used in different school sectors to reduce red tape, including efforts to reduce compliance requirements, and coordinate and streamline their impact in schools.
- Highlight better practices in jurisdictions, systems and sectors that have potential national application.
- Recommend potential national actions.

WHY REGULATORY REFORM?

Every year since 2011, the Australia Catholic University (ACU) has published the results of a comprehensive survey of principals of Australian schools. There are approximately 10,000 school principals in Australia; data has been collected from approximately half of them. The survey covers schools in all sectors: government, Catholic and independent.

The 2019 survey, conducted by Associate Professor Phillip Riley from Deakin University and Sioau-Mai See from ACU, identified that the sheer volume of work was the key factor in the high levels of work stress reported by principals. The lack of time to focus on their leadership roles in teaching and learning, rather than on administrative and compliance functions, was the second greatest cause of stress and anxiety.³ This has been a consistent theme since the survey commenced in 2011.

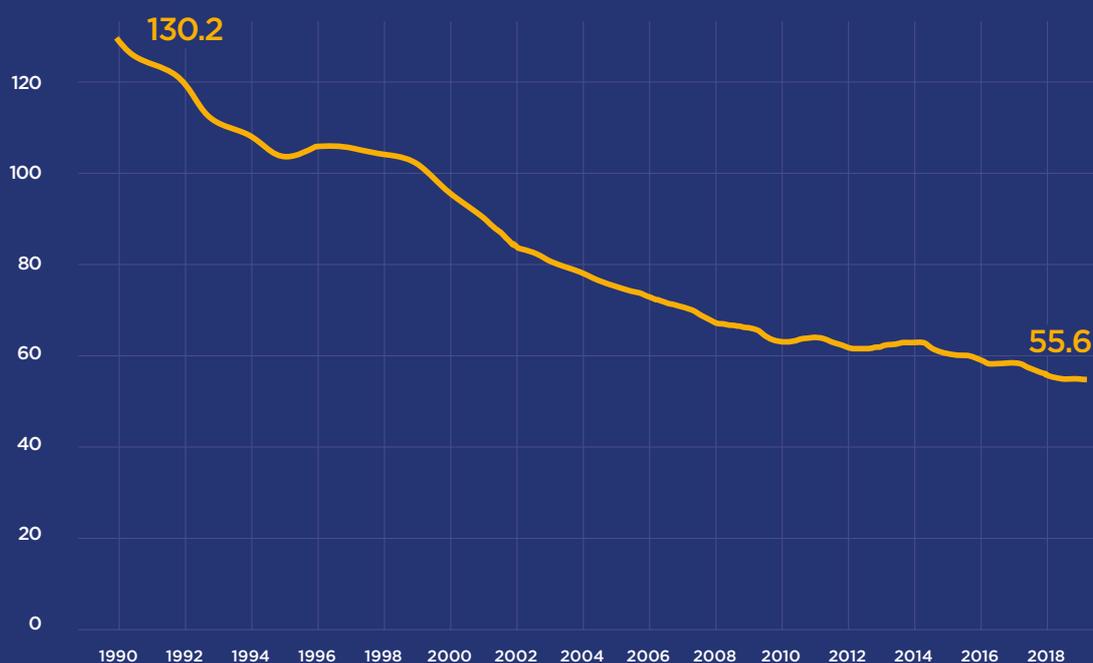
A report published by the NSW Teachers Federation again highlighted this trend for teachers in government schools. These teachers reported an increase in their work hours, and that their core business of teaching and learning were hindered by compliance requirements and administrative demands.⁴

These findings require serious consideration particularly given that educational outcomes in NSW have been in decline over the past decade.⁵

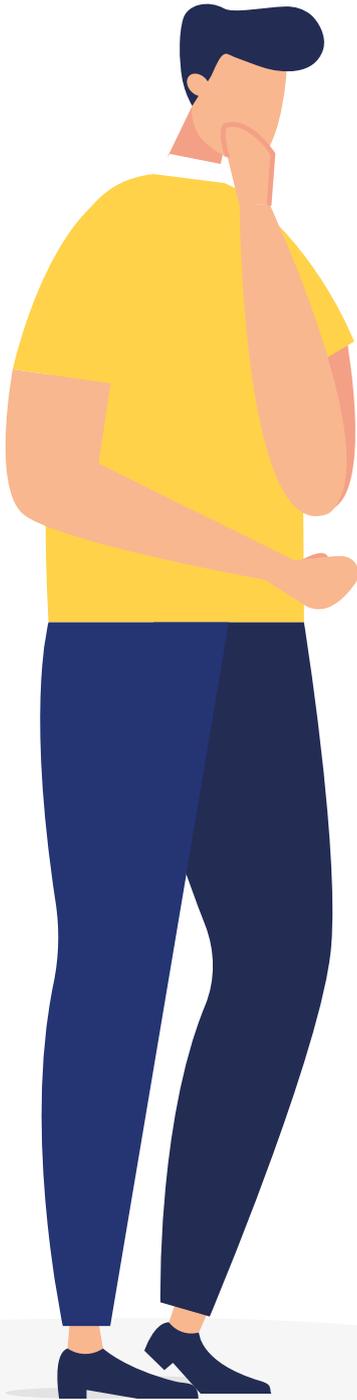
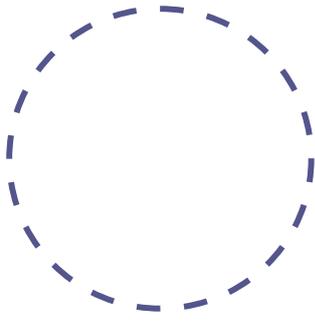
In Catholic schools, this burden remains despite a substantial increase in non-teaching staff. From 2000 to 2019, the percentage of staff in non-teaching roles in NSW Catholic schools grew from 18% to 25%. Despite this, stakeholders from across Catholic education have consistently reiterated that compliance and paperwork hold them back from focusing on their students.

An insightful representation of the increase in the number of administrative staff is best measured as a ratio to the number of students (see below figure 1). In 1990 there was one administrative staff member for every 130.2 students, while in 2019, there was one administrative staff member for every 55.6 students; even as enrolments have risen in NSW Catholic schools, the number of administrative staff required to manage compliance has increased at a much faster rate. Despite this, teachers have continued to report an increase in their work hours and increasingly unmanageable administrative demands.

Figure 1: Ratio of students to administrative staff in NSW Catholic schools



NSW Catholic Schools
1990-2019. FTE Figures
used. Source: NCEC
ACES 1990-2018, ACARA
MySchool 2019



Principals of both primary and secondary Catholic schools reported through the *Better, Smarter Regulation* consultation process that new or additional funding for schools has often been absorbed by new non-teaching staff who are hired to manage additional compliance burdens associated with new programmes. Historically, where non-government schools are given more funding, accountability measures are likewise increased.⁶ This can negate the positive effect that extra school funding is intended to achieve.

The *Better, Smarter Regulation* consultation process further identified that the increase in non-teaching staff is in part a consequence of additional layers of regulation introduced over the past two decades. This increased quantity of new regulation often happens without any review of old regulations, meaning new regulatory requirements are being added and the overall burden consistently increased. Examples of this include compliance related to school governance, privacy, not-for-profit status, whistleblowers, and modern slavery. While each of these areas require oversight, each new policy represents extra work for schools and their leaders. It is important for regulators to have regard for the impacts and consequences when developing new regulations affecting schools.

Catholic school principals have estimated that they are working towards managing almost 200 school policies. The sheer volume of policies is symptomatic of the overall compliance burden.

Catholic school principals have estimated that they are working towards managing almost 200 school policies. Some new policies may arise from schools developing a more comprehensive approach to mitigating legal risks, however, the sheer volume of policies is symptomatic of the overall compliance burden.

This volume of policies is a result of the multiplicity of school-sector regulators and the amount of applicable regulation and legislation. This requires sufficient capacity and budget to support compliance in schools. Very often, neither government nor those regulated have sufficient capacity to fully implement and obey the rules.

For effective implementation, it is critical that legislation and regulations be 'accessible'. For example, online access to applicable legislation and regulations is inadequate if the

content is not in a user-friendly format or readily available. Where they are accessible, they are able to be more effective in achieving their purposes. Where a regulatory regime is inaccessible, it loses credibility and creates additional barriers to achieving its intended outcomes.

The effective communication of the responsibilities imposed by a regulatory regime also help parliaments, governments and local authorities to better understand the impact of their own powers, duties and responsibilities.

Regulations are also less accessible when they comprise rules across various pieces of legislation and regulatory instruments. Where regulations and legislation are consolidated, they are more accessible to those seeking to comply. As a mechanism, consolidation is designed to bring together the text of existing statutes, usually within a single generic topic, and to amalgamate them in such a way that all amendments are integrated into the new single text.

For non-government schools in NSW there are several pieces of legislation dealing directly with schools, including the *Education Act 1990* (NSW), the *Teacher Accreditation Act 2004* (NSW), the *Education Standards Authority Act 2013* (NSW), the *Australian Education Act 2013* (Cth), and the *Australian Curriculum, Assessment and Reporting Authority Act 2008* (Cth). There are many others that deal predominantly with non-school matters, but also apply to schools, such as the *Disability Discrimination Act 1992* (Cth), the *Australian Charities and Not-for-Profits Commission Act 2012* (Cth), and the *Children and Young Persons (Care and Protection) Act 1998* (NSW), among many others. There is also an overabundance of regulations, frameworks and guidelines providing further oversight.

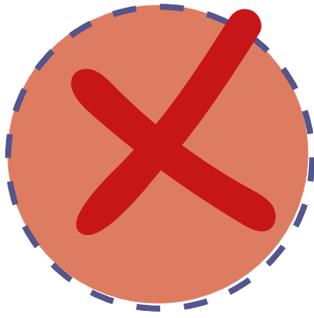
Both non-government schools and government regulators would benefit from the consolidation of the legislation and regulations governing them.



RECOMMENDATION

1. CSNSW recommends that the NSW Department of Education undertakes a project to consider consolidating the three NSW Acts regulating schooling, being the *Education Act 1990*, the *Education Standards Authority Act 2013*, and the *Teacher Accreditation Act 2004*, into a single schools statute, giving better guidance to the regulated population.





PRINCIPLES FOR BETTER REGULATION

Regulation of school education should be focused on helping schools to achieve the best outcomes for their students. As one school principal stated: “If it doesn’t lead to improved school learning, then it is not something we should be doing.” In summary, the regulation of schools must always be concerned with improving learning outcomes for students.

“If it doesn’t lead to improved school learning, then it is not something we should be doing.”

In regard to ‘best practice’ regulation more generally, when regulators consider new regulations or conduct a review of existing regulations, the following principles, drawn from leading Australian and international bodies, are instructive as to the approach.⁷

THESE PRINCIPLES ARE:

1. Regulations should be the minimum necessary to achieve the stated policy objective(s);
2. Regulations should be easy to understand i.e. written in plain English;
3. Regulations should be consistent and integrated with other laws in the same and other jurisdictions;
4. The overall benefits of regulation to the community should explicitly justify or outweigh the cost;
5. Regulations should be as simple as possible to avoid unnecessary restrictions on innovation and day to day activities alike;
6. Regulations should be able to adapt to changing circumstance without needing to be redrafted;
7. Regulations should be developed in consultation with the community, and be open to appeal and review;
8. Regulations should be clearly communicated to all stakeholders;
9. The need for, and purpose of, regulation should be established and clearly communicated;
10. Regulations should be enforced fairly and consistently; and
11. Where appropriate, regulation should be subject to mandated reviews or sunset clauses.



These principles inform CSNSW's approach to school regulation in this report. In particular, principles one through to five inform the recommendations identified with respect to each area of reform discussed. Applying these principles to the identified areas of reform has assisted in developing recommendations that seek to simplify the regulatory regime and build in greater flexibility, but which still help teachers and principals meet the underlying objectives of those requirements. This creates a more proportionate, balanced and straightforward regulatory system.

In light of the above principles for better regulation and the demonstrated need for regulatory reform, CSNSW is of the view that governments should develop a more sustainable and targeted approach to the regulation of schools.



RECOMMENDATION

2. CSNSW recommends that the Commonwealth and NSW Education Departments should implement ongoing initiatives to assess the impact and utility of existing and new regulations on schools. Specifically:
 - a. The Commonwealth and NSW Governments undertake a 'review and refresh' of all government regulation impacting schools every five years, assessing whether regulations are effective, fit for purpose, and are facilitating schools meeting their core aims of teaching and learning.
 - b. Regulators, regardless of industry, prepare a 'Schools Sector Impact Statement' on any regulatory proposal, assessing the time and cost impact on schools and school systems of new regulation. This would require the Commonwealth and State Departments of Education to undertake analysis of any new legislation and regulation to identify its impact on schools and school systems, particularly non-government schools, and provide advice about the impact of that regulation to the government agency advising on and building that regulation. This can help to shape regulations in a way that minimises unnecessary and undesired impacts.
 - c. Regulators undertake a 'fit for purpose' analysis of any new school-related legislation or regulation, assessing if and how the proposed legislation or regulation helps schools to achieve their stated core aims of improving teaching and learning.

PRIORITIES FOR REFORM

TEACHER ACCREDITATION

The aim of teacher accreditation policies are to improve teacher practice inside and outside of the classroom, and inform teachers of the standards they should be aiming to achieve at every stage of their career.⁸ This aim is shared by CSNSW, though it is arguable whether all of the existing processes are necessary to achieve it.

Policies and processes related to the regulation of teacher accreditation in NSW are founded on:

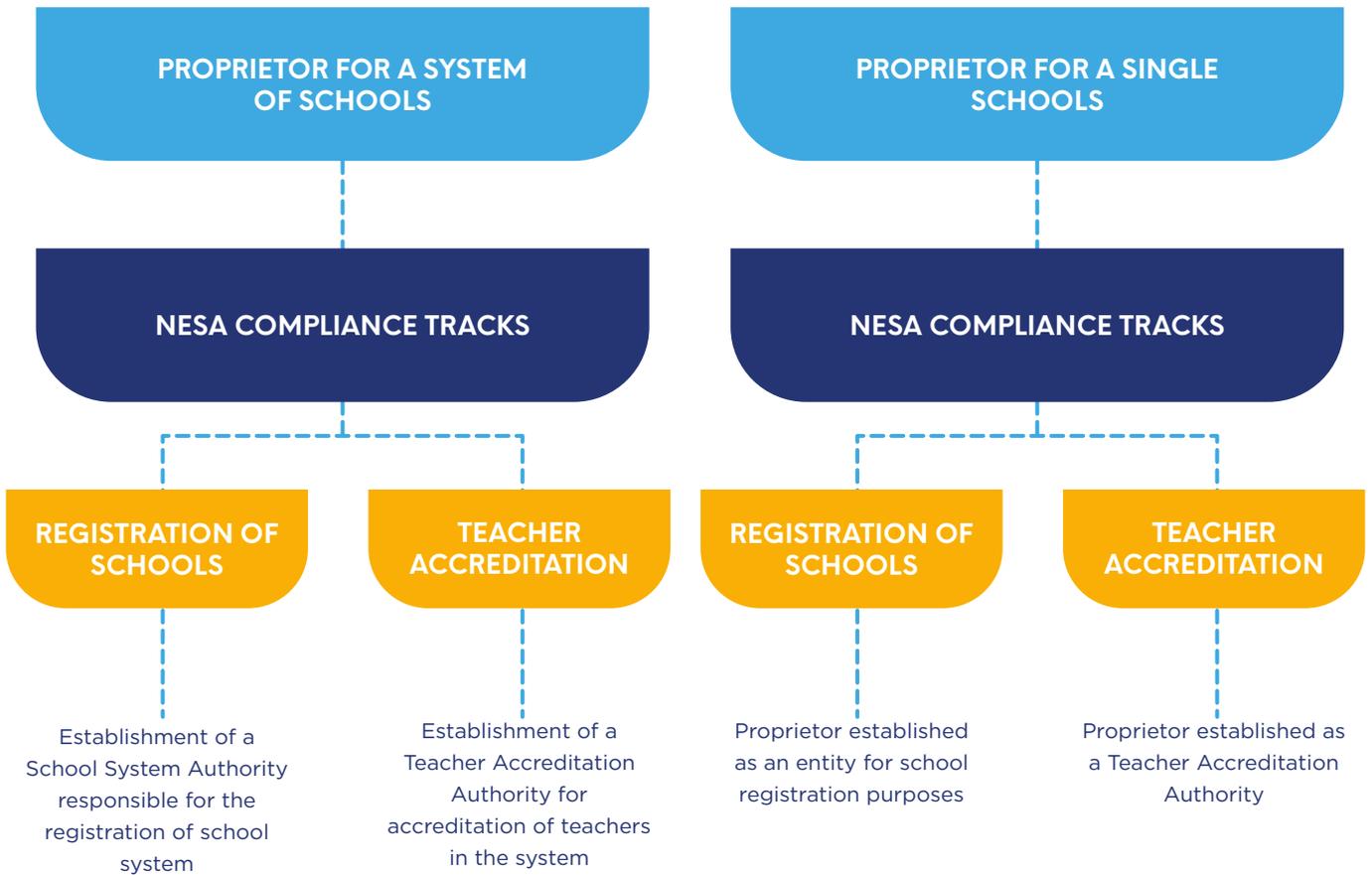
- the *Teacher Accreditation Act 2004* (NSW);
- the Commonwealth creation of AITSL in 2005 and in turn, AITSL's national teaching standards; and
- the *Education Standards Authority Act 2013* (NSW) (the NESAs Act).

These three steps now manifest in two separate NESAs compliance 'tracks' for schools: one for School Registration and another for Teacher Accreditation. This means school systems, and some schools, need to have two different legal personalities. For example, a diocesan school system is a 'registration system' under the *NSW Education Act 1990* for the purposes of School Registration and Accreditation for the HSC; it is also a Teacher Accreditation Authority under the *Teacher Accreditation Act* for the purpose of teacher accreditation (see Figure 2).

This is also expensive to implement at diocesan level, needing different personnel with particular expertise to support each of those two areas. Schools and diocesan systems are required to design and implement two sets of policies; one set dealing with the decisions about teacher accreditation and maintenance of accreditation; the other set is in relation to the policies required of a Teacher Accreditation Authority (TAA).



Figure 2: NESAs compliance tracks for school systems and individual schools



In 2020, in light of disruptions caused by COVID-19, NESAs provided general ‘extensions’ (of no specified time period) for Proficient Teacher applications, maintenance of accreditation periods, and payment of overdue fees. Aside from the payment of fees, these changes and recent experience provoke the question as to whether these ‘timelines’ are necessary.

NESAs has also recently conducted consultation with stakeholders in the education sector on proposed revisions to the Highly Accomplished and Lead Teacher (HALT) accreditation policy. These proposals are not yet implemented, but will lead to changes in the policy.



NESAs’s proposed revisions to the HALT accreditation policy include the following:

- the application process is now broken into three stages/modules which are seen to be more manageable;
- applicants are provided with ongoing feedback during the submission stages which is viewed as both positive and likely to result in more successful applications;
- a TAA can choose to have NESAs assess the application and make a recommendation, thus freeing up TAAs to provide greater support and advice for applications, rather than the current situation of conflicted interest.

Figure 3 explains the current process for applications for ‘Proficient’ teacher accreditation.

Figure 3: Process for Proficient Teacher Accreditation



ACCREDITATION DECISION

Proficient Teacher Accreditation report Supervisor reviews annotated evidence and prepares Proficient Teacher Accreditation Report; Teacher reviews and acknowledges report.

Principal attestation Principal/Service Director reviews report and attests that report is an accurate reflection of the teacher’s practice.

Teacher Accreditation Authority Review TAA reviews the documentary evidence, the observation report and the Proficient Teacher Accreditation Report.

Teacher Accreditation Authority decision TAA makes a decision to accredit and the maintenance period commences.

SUBMITTING EVIDENCE

Observation report Supervisor finalizes observation report, which includes: a record of discussion with teacher prior to observation, identification of selected standard descriptors, supervisors observations, supervisor feedback, a reflection from the teacher.

Collating and submitting evidence Documentary evidence and observation report collated by teacher and submitted to NESA.

COLLECTING EVIDENCE

Documentary evidence selection Teacher selects 5-8 pieces of documentary evidence demonstrating teaching practice, with each item of evidence referring to 2-4 standard descriptors; teacher consults supervisor re selection and standard descriptors.

Documentary evidence annotation Teacher annotates each piece of evidence, explaining how evidence meets practices identified in the standard descriptors.

Observation of teaching practice Teacher discusses and plans classroom observation with supervisor, agreeing on 2-4 standard descriptors that are the focus of the observation.

PREPARATION, REFLECTION AND DISCUSSION OF READINESS

Preparation Teacher needs at least 160 days of teaching.

Reflect on practice Teacher reflects on their practice in relation to the Australian Professional Standards for Teachers.

Discussion of readiness Teacher discusses readiness to apply and finalise accreditation with supervisor and/or Principal/Service Director.

Feedback from teachers and principals to CSNSW focused on the time imposition of teacher accreditation processes. Teachers and principals see the documentary evidence required by these processes as too detailed and prescriptive, and they are of the view that the processes would benefit from greater flexibility.

SPECIFICALLY, STAKEHOLDER FEEDBACK TO CSNSW IDENTIFIED THE FOLLOWING:

- Principals find that assisting early career teachers to work through teacher accreditation processes takes a significant amount of time, including the allocation of experienced teachers as mentors.
- As acknowledged by NESA, the requirements for progressing to the next level of accreditation, being Highly Accomplished and Lead, are more detailed and onerous than they need to be.
- Since 2018, it has been a requirement that all teachers maintain their accreditation over a 5-year cycle (noting that during 2022 all full-time teachers who were “deemed” Proficient in 2018 will need to have their accreditation renewed by their TAA). This obligation has created an obligation on principals to establish school-based, and NESA compliant, teacher accreditation quality assurance procedures for all their full-time teachers. Meanwhile, principals have to track the maintenance of accreditation for their graduate (new), part-time and casual teachers. This has created a significant compliance burden in schools. The opportunity cost of this is that executive staff are drawn into more compliance work as opposed to supporting teachers and school improvement. This compliance burden is sometimes addressed by the creation of a dedicated school executive position responsible for teacher accreditation, with all the attendant costs associated with these processes.
- The current process does not trust principals to make decisions about the capacity of their teachers, even though they are better positioned to recognise the capabilities of their own teachers. The policy is therefore overly prescriptive and detailed, as opposed to facilitating a process that provides space for a professional judgment about a teacher’s capability and performance.
- Most Proficient teachers, despite their competence and experience, do not have the time or inclination, or are not sufficiently incentivised, to undertake the additional work necessary to progress to the higher levels of teacher accreditation, being Highly Accomplished and Lead. The existing processes in part act as a barrier to Proficient teacher progression through the teacher accreditation levels.



RECOMMENDATION

3. CSNSW recommends that NESA moves to simplify teacher accreditation processes and better support teacher quality. To achieve this, CSNSW recommends that NESA considers the following changes to teacher accreditation processes:
 - a. Reducing the documentary evidence required to progress to the next teacher accreditation level or to maintain teacher accreditation.
 - b. Replacing some required documentary evidence with in-class reviews of teacher work and discussions between teachers and their school principal when a teacher is seeking to progress to the next level of accreditation.
 - c. Giving greater authority to System level and School level TAAs to decide on the evidence needed to determine if a teacher is ready to progress to the next level of accreditation, with NESA giving particular regard to measures to maintain quality and consistency.
 - d. To promote flexibility for TAAs, NESA could reduce the number of “Standard Descriptors” that each teacher is required to address at each level of Accreditation; being Proficient, Highly Accomplished and Lead, as assessed by their TAA.
 - e. Permanently maintaining the adjustments that have been successfully implemented in 2020 in response to COVID-19.

NATIONALLY CONSISTENT COLLECTION OF DATA (NCCD) ON STUDENTS WITH DISABILITY

NCCD implementation is a statutory requirement under the *Australian Education Act*. The NCCD is an integral element of the current schools funding model and the Commonwealth and NSW Departments of Education use the data collected to generate recurrent funding allocations for schools. It enables schools, education authorities and governments to better understand the needs of students with a disability and how they can be best supported at school.⁹

Schools also separately use NCCD processes and student assessment outcomes to meet the reasonable adjustments requirements for students with disability arising from the application of the Commonwealth *Disability Discrimination Act 1992* and the related Disability Standards for Education, 2005.

While most students eligible to be included in the NCCD attract additional funding through the Students With Disability Loading, 25% of students at the quality differentiated teaching practice (QDTP) level do not attract this loading. Students at the QDTP level are those students assessed as only requiring QDTP as their “reasonable adjustment”, pursuant to both NCCD methodology and Commonwealth *Disability Discrimination Act 1992* requirements. These students are still subject to the same evidentiary requirements for the NCCD Collection as funded students.



IN RESPONSE TO COVID-19, THE 2020 NCCD GUIDELINES WERE REVISED TO INCLUDE THE FOLLOWING SPECIAL PROVISIONS:

- Reducing the requirement for schools to maintain evidence of adjustments provided to students with disability from a minimum of 10 weeks to a minimum of 6 weeks over the 12 months preceding the reference date for all students who would normally be eligible for the NCCD.
- Introducing revised evidence requirements for specific cohorts of students who though normally eligible, but may not meet the NCCD requirements due to disruptions caused by the pandemic. These specific cohorts include Kindergarten/Foundation Year students, new enrolments, students with newly diagnosed or imputed disability, and students attending special assistance schools.



STAKEHOLDER FEEDBACK IDENTIFIED THE FOLLOWING:

- There is strong and universal feedback that NCCD evidentiary requirements are excessively time consuming for classroom teachers and particularly so for primary school teachers. As one school principal expressed: “this is a nightmare.” This sentiment is widely shared. The point is consistently and strongly made that NCCD “is the most onerous evidence collection process” schools have to undertake.
- Principals expressed frustration that NCCD processes (including identification, collection, verification and storage of NCCD evidence) reduce the time specialist teachers give to implementing learning strategies in support of students who have a disability.
- As a consequence of the administrative burden, some schools have to incur additional costs to hire casual teachers to provide release time for teachers, and engage extra administrative staff. The educational support value of the attracted disability loading funds is therefore eroded by NCCD administration costs.
- The benefit of the NCCD model and its associated processes is that it provides schools with a mechanism to allow them to fulfil their obligations to students under the Commonwealth *Disability Discrimination Act 1992* and related *Disability Education Standards 2005*, and it helps teachers to deliver the education that students need.



RECOMMENDATION

4. CSNSW recommends that the Commonwealth Department of Education, Skills and Employment (DESE) considers changes to the NCCD administrative requirements and simplifies reporting protocols. These possible changes include:
 - a. reducing the requirements associated with external reporting on any student that only requires quality differentiated teaching practice (QDTP).
 - b. reviewing the special provisions implemented in response to COVID-19 to assess whether there is value in permanently maintaining these special provisions. If a review finds that these special provisions relieve teachers of a significant administrative burden while maintaining the benefits of the NCCD for those students, then there would be merit in adopting those special provisions on a permanent basis.

SCHOOL GOVERNANCE

In recent years, school principals have had to respond to increased responsibilities with respect to the governance of their schools. As funding to non-government schools increased, governments increasingly focused on improving school governance to ensure non-government schools were managed in a transparent and accountable manner. This is evidenced in the *Australian Education Act 2013* (Cth), the application of the *Australian Charities and Not-for-Profits Commission Act 2012* (Cth) (the ACNC Act) to non-government schools, and the 2014 governance and not-for-profit amendments to the *Education Act 1990* (NSW).

With the establishment of the ACNC and the enactment of the *Australian Education Act* (in 2013), and school governance and not-for-profit amendments to the *NSW Education Act* (in 2014), principals have become “responsible persons” in legally binding ways.

School principals must also manage Australian Curriculum, Assessment and Reporting Authority (ACARA) priorities, such as NAPLAN testing and MySchool reporting, while also discharging teacher accreditation responsibilities pursuant to the *Education Act 1990* (NSW), the *NESA Act 2013* (NSW), and the *NSW Teacher Accreditation Act 2004* (NSW).

With respect to child protection responsibilities, principals must implement the requirements of the NSW Office of the Children’s Guardian under the *Children’s Guardian Act 2019* (NSW).



STAKEHOLDER FEEDBACK FOCUSED ON THE FOLLOWING:

- School staff report that over the past decade, governance has taken up an increasing amount of time. Some principals estimate that this takes at least one full day of work per week.
- The Association of Catholic School Principals advised that principals need more time to focus on students, and this could be created by simplifying governance requirements. This is more often a problem for non-systemic schools.
- School Boards, at times, relate to school principals and other executive staff in a very corporate manner, which does not suit the school environment and mission.
- Where schools, or systems of schools, are organised as companies limited by guarantee, the responsibilities of directors under the *Corporations Act 2001* have expanded over the past decade. This had led to a substantial increase in work for both school boards and school principals. Some principals report that these expanded responsibilities have created additional responsibilities and risks that are not appropriate for schools. This can be a significant source of stress for school principals.

- For Diocesan education offices, governance requirements in respect of systemic schools have necessitated significant increases in office staffing and a reordering of school support priorities in ways which detract from the more educational purposes of systemic schools.
- There are increasing costs associated with these governance requirements. Some schools, where finance is available, are appointing executive level school compliance managers. Other schools are contracting governance service providers such as CompliSpace. Indeed, a whole school compliance specialisation has arisen.
- The increase in the compliance requirements of secular regulators can come at the expense of school staff focusing on the Catholic dimension of the governance of Catholic schools. Since 2008, new regulators in the school sector have included the Australian Skills Quality Authority (ASQA), the Australian Charities and Not-for-profit Commission (ACNC), the Australian Children's Education and Care Quality Authority (ACECQA), ACARA, the Australian Institute for Teaching and School Leadership (AITSL), and the NSW Section 83C Not-For-Profit Advisory Committee.



RECOMMENDATION

5. CSNSW recommends that NESA and the NSW Department of Education redouble efforts to reduce the compliance and regulatory-related workload of school principals by simplifying the regulatory experience in schools. To support this, CSNSW recommends NESA conducts a review of the responsibilities of school principals in respect of school governance, with the aim of identifying tasks and roles that would be better assigned to the school governing body. This will allow principals more time to focus on their core business of teaching and learning.



FINANCIAL COMPLIANCE

Financial compliance requires schools and school systems to report directly to the Commonwealth DESE, the NSW Department of Education (NSW DoE), the ACNC, and NESAs. An overview of each of these reporting requirements is outlined below.



FINANCIAL ACCOUNTABILITY REQUIREMENT	REQUIRED BY
<p>Financial accountability statement for Commonwealth Government, provided annual in 2 parts:</p> <ol style="list-style-type: none"> Acquittal of the expenditure of Commonwealth general recurrent grants received in the prior calendar year, signed by an independent auditor A break-down of Commonwealth general recurrent grants for each school into a base amount and loadings amounts including for the loadings for the six types of disadvantage under the Australian Education Act. <p>(Note that as Commonwealth and State grants are deployed under the same needs-based funding arrangement, a break-down for the State grants is also prepared by CSNSW.)</p>	DESE
<p>Financial Accountability Statement for State Government, in 3 parts:</p> <ol style="list-style-type: none"> Acquittal of the total expenditure of NSW general recurrent grants in the prior calendar year, signed by an independent auditor Certification by an independent auditor of student census figures for the prior year, provided to NSW DoE for the purposes of receiving funding in 2018, is requested by the NSW DoE. Certification of compliance with Section 83C of NSW <i>Education Act 1990</i>, which establishes 'not-for-profit' criteria for schools. This certification is signed by CSNSW as the funding authority (statement made in relation to receiving funds for the 2019 year). 	NSW DoE
<p>Financial Questionnaire (FQ)</p> <p>This is a form of financial data for each school in a specialised and tailored format specified by DESE. The information includes profit and loss data primarily but with some additional Balance Sheet and cash flow items added.</p> <p>The FQ data must be drawn from independently audited financial statements (FS) (see item below). A financial reconciliation between the Financial Questionnaire data and the FS must be prepared and be available for inspection by DESE or its auditors upon request.</p>	DESE
<p>MySchool financial data</p> <p>This is a format of financial data for each school each year, prescribed by ACARA, which shows Net Recurrent Income Per Student and Capital Expenditure sources of funding.</p> <p>This MySchool data is required to be provided to DESE, in conjunction with the FQ data, and this MySchool data is passed by DESE to ACARA. ACARA subsequently seeks validation from schools and school systems of the MySchool data it has received. ACARA also conducts external financial audits of the data for a sample of schools selected at random each year.</p>	ACARA (Provided to DESE, who passes this to ACARA)
<p>Annual Information Statement (AIS) including financial data.</p> <p>This includes a simplified set of financial data, prescribed by the ACNC, for entities registered with the ACNC, in the format of a Statement of Profit or Loss and Statement of Financial Position.</p> <p>The ACNC maps this data from the FQ data.</p> <p>This includes the total amount of government grants for each school in the system.</p>	DESE and ACNC (Provided to DESE who passes to ACNC)
<p>Audited Financial Statements</p> <p>Financial Statements for each ABN, prepared in accordance with Australian Accounting Standards and audited by an independent auditor, are required to be submitted to DESE who passes them on to the ACNC.</p> <p>This arrangement is an interim arrangement to satisfy the reporting requirement of charities which conduct school education. The ACNC regulates charities by requiring financial reporting by each ABN, but the structure of ABNs does not necessarily reflect the structure of schools or school systems. For example, one ABN may have a range of charitable activities only one of which is school education. Also, some systems of schools have one ABN only while others have ABNs for each school. This mismatch of structures creates difficulties in interpreting the financial statements published on the ACNC website for education purposes.</p>	Provided to DESE, who passes to the ACNC for publication
<p>Annual School Reports</p> <p>These are required to include school financial information based on the data provided in the Financial Questionnaire.</p>	NESA

As evidenced above, the financial compliance framework involves multiple regulators requiring overlapping financial information. There is an obvious opportunity to simplify financial reporting by reducing the number of regulators to whom non-government schools report, without at all reducing transparency.

At its inception, the ACNC was promoted as the “one-stop shop” for the administration of compliance requirements for all charities. The ACNC Act provides for the regulation of Catholic schools in their capacity as charitable entities. In contrast, the ACNC has no jurisdiction in respect of public schools since government entities cannot be charities.

With respect to not-for-profit compliance this means that Catholic schools must address five overlapping regulators, being the ACNC, ACARA, DESE, NESA, and the NSW DoE. The consequence is a multilayered compliance environment which presents school administrators with recurring reporting tasks and risk exposures.

CSNSW recognises that various Commonwealth agencies at various times have attempted to adopt improved and streamlined processes. The ACNC’s red-tape reduction program is a notable example. Another was DESE’s efforts towards an IT system solution to collect once and use many times. However, the complexity of the system of interacting stakeholders from the non-government schools’ sector and government agencies, changes in agency leadership and Commonwealth internal IT management issues have thwarted significant progress to date.

STAKEHOLDER FEEDBACK FOCUSED ON THE FOLLOWING:

- Principals report high levels of anxiety with respect to not-for-profit compliance. The multiplicity of regulators and guidelines means expanded responsibilities, workloads and risks. This creates additional workloads for school secretaries and, where they exist, school Business Managers. It has led some schools to incur the additional compliance costs associated with new and additional audit procedures. In primary schools the increased compliance burden falls directly on school principals.
- In Catholic school systems, the burden of not-for-profit compliance is also felt at the diocesan level. Not-for-profit compliance requires significant resourcing in diocesan education offices, which creates a considerable opportunity cost.
- Oversight by the various regulators involves unnecessary duplication of reporting, and consequently, unnecessary duplication of work. At the Commonwealth level alone, three agencies, DESE, ACARA and ACNC have regulatory oversight of the non-government school sector and each have differing financial reporting requirements.
- Three specific financial reporting issues are an on-going concern:
 - The DESE FQ is in need of review. In its current form, it does not follow accounting standards so non-government schools cannot use normal accounting services to prepare it. Rather, specialist staff are required.

- The ACNC regulates charities via their ABN registration, but the structure of schools and school systems does not necessarily follow the ABN structure. Therefore, financial reporting for schools is not necessarily compatible or consistent with reporting by ABN.
- Financial reporting for schools that operate as single, independent entities is necessarily different to financial reporting for systems of schools that operate in an integrated fashion. The different requirements for systems of schools is often not adequately recognised in regulatory requirements.



RECOMMENDATION

6. CSNSW recommends that the Commonwealth and NSW Governments streamline financial reporting requirements, while ensuring that transparency and accountability are maintained. CSNSW recommends:
 - a. DESE leads a whole-of-Commonwealth Government, systemic review process aimed at the re-engineering of processes for financial reporting for the non-government schools’ sector. This review would require high-level commitment from the three key regulatory bodies, being DESE, ACARA and the ACNC as well as Commonwealth agencies involved in implementing the *System Interoperability Framework* (SIF) within school education.

The steering committee for the review would require representation from the relevant Commonwealth agencies to enable improvements and cross-agency trade-offs to be effected.

Given the recurring issues with financial reporting have been evident and widely discussed for some time, CSNSW recommends the timetable for the review be short and deliver a concrete set of implementation policies defined for prompt execution.

The efficiency dividends from the successful implementation of such a process would be very significant for both the Government agencies involved as well as the non-government schools’ sector.

CSNSW could work with the Commonwealth in this effort by coordinating Catholic sector participation and/or taking part in solution trials in the future.
 - b. That NESA audit requirements move to a 3-year audit cycle, in which one-third of schools are audited each year, with every school being audited every three years.

OTHER OPPORTUNITIES FOR REFORM



VOCATIONAL EDUCATION & TRAINING

All Vocational Education and Training (VET) is governed by the VET Quality Framework. To maintain registration as a Registered Training Organisation (RTO), organisations, including schools, must comply with every component of the framework. Since July 2011, this compliance has been audited by the Australian Skills Quality Authority (ASQA). In NSW, systemic Catholic schools, nine Diocesan Education Offices are registered as RTOs and the schools are deemed delivery or training sites within the RTO. Some Catholic independent schools are separately registered as RTOs.

The 2015 Standards for RTOs require school teachers delivering VET programmes to:

- Hold the VET qualification they are delivering;
- Hold the TAE40116 Certificate IV in Training and Assessment (or the TAE20110 and the two additional units of competency) or a higher level qualification in adult education, and
- Maintain industry currency.

In addition to ASQA requirements, all teachers are required to complete 100 hours of professional development over a five-year maintenance cycle (seven years for casuals/part-time teachers) to meet NESA professional development requirements. NESA recognises VET-specific teacher training as professional development and includes this training for the purpose of meeting the 100-hour threshold. Initial VET qualifications range from 21-180 NESA accredited hours with the TAE40116 Certificate IV in Training and Assessment contributing an additional 21 hours and VET orientation an additional 14 hours. VET transition programs are also accredited with NESA. This means that in some maintenance cycles, VET teachers are required to do more than 100 hours of professional development.

In light of this, there is merit in NESA conducting analysis of whether training undertaken by school VET teachers to meet the needs and demands of industry changes be recognised by NESA for the purposes of professional development requirements beyond the maintenance period in which that training is undertaken. This would allow some VET teacher training to 'carry over' into the next NESA teacher accreditation cycle.

The Commonwealth DESE recently engaged *mpconsulting* to undertake a 'Rapid Review of the Australian Skills Quality Authority's Regulatory Practices and Processes' (the Rapid Review) to study how the architecture of the VET sector can be improved to better deliver the skills needed for Australia's future. The recommendations of the Rapid Review can make valuable improvements to VET in schools.

STAKEHOLDER FEEDBACK FOCUSED ON THE FOLLOWING:

- While there is a case for maintaining each set of NESA and ASQA regulations in the VET area, particularly in regard to the professional development of teachers, when they are cumulatively added on to schools, they become too time consuming and act as a disincentive to becoming a qualified VET teacher.
- The level of documentation required and the need for constant re-training of school-based VET teachers is a disincentive for school teachers to engage in VET.
- The Rapid Review made a number of recommendations that are supported by school-based VET teachers and school principals.



RECOMMENDATION

7. CSNSW recommends that DESE and ASQA seek early consideration and implementation of the recommendations of the 'Rapid Review of the Australian Skills Quality Authority's Regulatory Practices and Processes'. In particular, the following recommendations could have a positive impact on the regulatory burden:
 - a. Recommendation 2: Developing new standards, aimed at decreasing prescriptive detail and increasing the focus on quality training delivery and outcomes.
 - b. Recommendation 4: Adjust ASQA's approach to performance monitoring in line with revised standards and a focus on provider self-assurance.
 - c. Recommendation 14: Adopt a range of monitoring activities that can be selected based on risk and the purpose for monitoring, to better align regulatory effort to risk.
8. CSNSW recommends that NESA and ASQA review professional development for accredited VET teachers to identify and compare professional development requirements against non-VET teachers.

SCHOOL CURRICULUM AND SCHOOL REPORTS TO PARENTS

The NSW *Education Act 1990* (the NSW Act) establishes NESA as the authority for developing the NSW school curriculum. The NSW Act identifies key learning areas and minimum curriculum requirements for both primary and secondary education. NESA'S syllabus documents, registration manuals and guidelines expand on the evidence schools must provide to demonstrate compliance with the minimum curriculum requirements identified in the NSW Act.

The *Australian Education Regulation 2013* establishes that schools must provide a report on a student's progress and achievement: (i) against any available national standards, (ii) relative to the performance of the student's peer group, and (iii) on a 5 point scale (for example A-E) for each subject studied. For Semester One, 2020, the Commonwealth Minister for Education has granted schools increased flexibility in student reports by providing an exemption from reporting on a five-point scale.

FEEDBACK FROM TEACHERS AND PRINCIPALS IDENTIFIED THE FOLLOWING:

- The NESA rule that schools must maintain “teaching programmes for each unit of work that correspond to those identified in the scope and sequence of learning/units of work” is supported by advisory information on the NESA website. This advisory information is used by NESA to determine the compliance status of schools. This effectively makes ‘advisory information’ a regulatory requirement (at least in the eyes of schools). This is confusing for administrators and school principals.
- There are questions about the need for scope and sequences in learning programmes if those programmes are showing that the work is being covered. Primary schools, where each teacher has responsibility for learning across all Key Learning Areas, have identified this as a particular burden.
- The curriculum in its present form is too prescriptive. It requires teachers to focus on all outcomes listed in the syllabus, without providing teachers the discretion to focus on outcomes that they see a particular need for among their students. As a consequence, there are not sufficient instructional hours available to schools to address all the required curriculum content. This is particularly the case for primary schools.
- Some syllabus outcomes come across to teachers as somewhat vague, with the consequence that compliance becomes open-ended.
- The NSW syllabus requirements do not align with the student reporting requirements under section 59 of the *Australian Education Regulation 2013*. Student reporting requirements need to be aligned more with the syllabus outcomes for each course of study.



RECOMMENDATION

9. CSNSW recommends that the Commonwealth Government simplifies oversight of student reports and grant schools increased, permanent flexibility as to how they report on student achievement and progress. CSNSW recommends this is done by:
 - a. The Commonwealth Government referring regulation of student reports to State Governments to facilitate better alignment between the NSW curriculum and student reports.
 - b. Alternatively, if the Commonwealth Government retains oversight of school reports to parents, that it grants schools permanent flexibility as to how they report on student achievement and progress, giving teachers more discretion to report according to their own professional judgment and the needs of parents/carers.
10. CSNSW recommends that NESA clarifies the difference between advisory information and the explicit ‘requirements’ for teaching programmes. It could make clear in its advice to schools that advisory information is a guideline, not a requirement, or otherwise provide clear direction as to criteria that are guidelines or requirements.
11. CSNSW recommends that NESA considers making permanent the changes introduced in response to COVID-19, including giving principals the authority to decide which syllabus outcomes and content they teach and assess for Kindergarten to Year 10 in 2020.

SCHOOL ANNUAL REPORTS

These reports, which are a NESA registration requirement, duplicate other lines of reporting, provide little new information and create an administrative burden. Public accountability is assured through other systems of reporting, which includes public reporting on the My School website; with educational outcomes, public funding, and private income all reported through each school's governing body.



RECOMMENDATION

12. CSNSW recommends that NESA removes the current requirement for schools to produce an annual report, noting essential information required for transparency of school operations is already publicly available through My School.

NESA SCHOOL REGISTRATION MANUALS

As noted above, these manuals create confusion between 'requirements' and 'advisory information'. The required evidence for registration overlaps with advisory information, conflating requirements with advice. Confusion also exists between the separate advice provided for Teacher Accreditation Authority compliance, as distinct from School Registration requirements as well as accreditation requirements for the delivery of the HSC.

Clarification as to what is 'advisory information' and what are mandatory compliance requirements, will help address the complaint that school registration manuals are overly prescriptive.



RECOMMENDATION

13. CSNSW recommends that NESA removes ambiguity around the status of 'advisory information' for schools, clarifying what is advisory information and what is a compliance requirement.



COVID-19 OPPORTUNITIES

NESA has responded to additional pressure on school staff created by COVID-19 by relaxing some curriculum-related requirements. While some COVID-19 adjustments have been discussed above, other adjustments adopted by NESA are discussed below.

SCHOOL BASED ASSESSMENT FOR STAGE 6

NESA has given principals and system authorities the power to determine the number, type and weighting of tasks for HSC and Preliminary Course (Year 11) school-based assessment. Prior to this, school-based assessment requirements for Preliminary Courses and HSC courses were highly prescriptive, and mandatory. This discretionary provision initially was intended for application to the 2020 Preliminary and HSC courses, however it has now been extended for application to the 2021 Preliminary and HSC courses.

NESA is now in a position to maintain a less prescriptive and burdensome approach where principals are trusted to make these determinations. This could be supplemented by school monitoring which could assess the processes used by schools to ensure the validity and reliability of their assessment policies and procedures, as well as the resulting judgements about student progress and achievement.



RECOMMENDATION

14. CSNSW recommends that NESA examines the benefits of maintaining the changes granting discretion to principals and system authorities to determine the number, type and weighting of tasks for HSC and Preliminary Course (Year 11) school-based assessment.

MAJOR PROJECTS: MOVING FROM EXTERNAL MARKING TO TEACHER MARKING OF PROJECTS

For Design and Technology, Industrial Technologies, Textiles and Design, and Visual Arts, NESA has determined that the major project components of these subjects ('Body of Work' in the case of Visual Arts) will be marked by teachers rather than external HSC markers.

NESA has undertaken to provide support materials to assist teachers with this internal marking procedure. In response to concerns with this shift in policy, NESA stated it will monitor marks provided by teachers to ensure fairness and integrity. This may mean additional work for school inspectors, but it will relieve administrative burdens from school staff. These decisions shift judgements about the standards students have reached to teachers who are well placed to assess the work of their students.

If teachers prefer to operate in this way, then NESA could continue to allow teachers to mark student work, rather than external markers, so long as there are safeguards to ensure teachers exercise consistent judgment both within and across schools in the allocation of marks.



RECOMMENDATION

15. CSNSW recommends that NESA explores whether there is support for, and merit in, maintaining on a permanent basis, the reallocation of responsibility for the marking of major project components of Design and Technology, Industrial Technologies, Textiles and Design, and Visual Arts, away from external HSC markers to school teachers.

MUSIC, DANCE AND DRAMA

Changes have been made to the performance components of these courses. Adjustments to the assessment of 'performance' in music, dance, and drama have mapped a path for the simplification of assessment processes for the HSC. These streamlined approaches should be evaluated with a view to maintaining them beyond 2020.



RECOMMENDATION

16. CSNSW recommends that NESA examines the merits of maintaining, on a permanent basis, the simplification of assessment processes for music, dance and drama, introduced in response to challenges presented by COVID-19.

ENDNOTES

- ¹ Louden, W. Paul, L. Lambert, P. 2016. *Review of the Board of Studies, Teaching and Educational Standards: Report of the Independent Panel*.
- ² Regulatory Policy Framework Review Panel. 2017. *NSW Regulatory Policy Framework: Independent Review*.
- ³ Riley, P. Sioau-Mai, S. 2019. *The Australian Principal Occupational Health, Safety and Wellbeing Survey*. The Australian Catholic University: Institute for Positive Psychology and Education.
- ⁴ McGrath-Champ, S. Wilson, R. Stacey, M. Fitzgerald, S. (2018). *Understanding Work in Schools: The Foundation for Teaching and Learning (2018 Report to the NSW Teachers Federation)*. The University of Sydney; Curtin University.
- ⁵ Organisation for Economic Cooperation and Development. 2019. *Programme for International Student Assessment (PISA) Results from PISA 2018*. <http://www.oecd.org/pisa/publications/PISA2018_CN_AUS.pdf>
- ⁶ Baker, I. Watson, J. (2020). School's in, School's out – says who?. Kathleen Burrow Research Institute. <https://www.csnsw.catholic.edu.au/media_and_advocacy/https-www-csnsw-catholic-edu-au-wp-content-uploads-2020-06-schools%20in%20schools%20out%20-%20says%20who-pdf/>
- ⁷ These principles are drawn from the Australian Productivity Commission, the Report on the education sector by the Australian Senate Select Committee on Red Tape (October 2018), the NSW Government Guide to Better Regulation, the Organisation for Economic Cooperation and Development (OECD) and the British House of Lords Inquiry into 'The cumulative impact of statutory instruments on schools'. See also Argy, Steven and Johnson, Matthew, *Mechanisms for Improving the Quality of Regulations: Australia in an International Context*, Productivity Commission Staff Working Paper, July 2003.
- ⁸ Australian Institute for Teaching and School Leadership. 2020. *Understand the Teacher Standards*. <<https://www.aitsl.edu.au/teach/standards/understand-the-teacher-standards>>
- ⁹ Commonwealth Department of Education, Skills and Employment. *Nationally Consistent Collection of Data on School Students with Disability*. <<https://www.nccd.edu.au/>>
- ¹⁰ Australian Institute for Teaching and School Leadership. 2020. *Understand the Teacher Standards*. <<https://www.aitsl.edu.au/teach/standards/understand-the-teacher-standards>>



Catholic Schools NSW Ltd

ABN: 46 619 593 369

Level 9, 133 Liverpool Street

Sydney NSW 2000

02 9287 1555

PO Box 20768

World Square NSW 2002

www.csnsw.catholic.edu.au