



ASSOCIATION OF HEADS OF INDEPENDENT SCHOOLS OF AUSTRALIA

AHISA Submission
Review of the NSW Board of Studies, Teaching and Educational Standards

15 May 2016

AHISA (NSW/ACT) is pleased to be able to present our views to the Minister's Review of the NSW Board of Studies, Teaching, and Educational Standards. We believe that the review is an important exercise for education in this state due to the pivotal nature of the role of BOSTES in determining curriculum, guiding assessment, registering schools and accrediting teachers.

Our Association represents the Heads of 120 independent schools across NSW and the ACT. These communities comprise more than 105,000 students and more than 15,000 staff and have the support of hundreds of thousands of Australian parents who choose to send their children to our members' schools. This strong support of independent schools is evidence of the high quality of educational leadership demonstrated by our members.

According to Australian Bureau of Statistics Schools Australia 2015 data, some 35% of NSW students attend non-government schools, including 13% of students enrolled in independent schools. The independent sector's share of enrolments in Years 11 and 12 increases to 17.3%. Given the role of BOSTES in registering our schools and accrediting our teachers, it is essential that the views of our sector are represented significantly and understood clearly in this review of BOSTES. As well as this written submission, we would be pleased to meet with the review team to explore more fully some of the issues raised by us.

We recognise that we have organised our submission differently from either the terms of reference or the questions raised in the issues paper. The submission below is organised around the expressed views of our membership on BOSTES and the best way forward for NSW.

Governance

It is the view of AHISA that a strength of school education in NSW has been based on the broad representation on the Board of BOSTES (and its predecessors) of all stakeholders in education – outstanding educators, teacher unions, parents and system authorities. The Board of BOSTES can, therefore, provide quality advice to the Minister of Education in NSW on all aspects of curriculum, assessment, and educational policy, having already understood the issues from all different points of view. While it could be argued that the Board is overly-large, its representative nature is important.

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It is essential that the Board of BOSTES maintain this feature of the present arrangements, and that AHISA has a voice/s on the Board. Indeed, as the independent sector has grown in the share of enrolment over the 26 years of the existence of BOSTES (and its predecessor BOS), and is a significant provider of school education in NSW at the senior secondary level, we put forward the case that AHISA must have representation directly on the Board of BOSTES and the Quality Teacher Council, and/or any other replacement body or bodies. Similarly, AHISA must have representatives on committees of BOSTES (curriculum committees, registration committee and so on).

We know that there is a view amongst the membership that the Board of BOSTES should act in a governance role over the operations of the Office of the Board, in the way that the Councils or Boards of Directors function in most of the independent schools we represent. Were the purpose of the Board to change from its current focus, AHISA would want to have the opportunity to contribute to the discussion about the best governance arrangements to suit the new organisation's outcomes.

Notwithstanding the above, and if the purpose of BOSTES is to remain unchanged, the Executive is happy to endorse the current arrangement whereby the Chair of BOSTES is also the President of BOSTES. Under the current arrangement, the Office of BOSTES, separately responsible and accountable as a public service organisation, and independently audited, is a good arrangement. This allows the representative BOSTES to act as policy advisors and regulators, defining curriculum, assessment and teaching standards to achieve the highest quality education for NSW, rather than the quite different skills of governance and oversight of management.

Office of BOSTES

Our Association is strongly of the view that the independence of BOSTES is non-negotiable. In particular, the Office of the BOSTES (those charged with supporting administratively and advising the Board of BOSTES on all educational policies and other matters) should be independent of all systems. Above all, the Office of BOSTES must be independent of the NSW Department of Education – to ensure that all schools in our state are treated equally and that all government and non-government schools are given the same privileges and submit to the same regulations.

Registration and Accreditation

We have significant concerns about the registration processes for schools and accreditation processes for teachers being used currently by BOSTES. We understand the difficulties of ensuring that all non-government schools provide a high-quality education for the students of NSW, and of course, this function is something we support most strongly. But we believe that the BOSTES processes are overly bureaucratic and constraining on our membership. We strongly encourage BOSTES to develop a new approach to registration of schools, so that low-performing schools are targeted for improvement, but high performing schools are supported and provided with the flexibility they need to deliver the highest quality education without trivial, rigid, bureaucratic and

time-wasting paper audits and non-constructive registration procedures. One way that this might be implemented is for schools which have a proven track record, involving a number of previous unblemished registration and accreditation procedures, could have targeted areas checked each five years, rather than all areas reviewed each five years. The current process involves a significant intrusion and dysfunction to school routines which is not desirable. It promotes needless stress and anxiety and distracts teachers and senior school staff from our core business - teaching and learning.

For example, one AHISA member's school – a K-12 school which went through registration and accreditation with BOSTES last year, was required to upload over 600 documents to the registration website. Even the scanning of so many documents is an extremely time-consuming task, as is the uploading process. One suspects that the effort and time involved was not exactly proportionate to the possible benefits of the process.

In the last 2 years, BOSTES has increased the areas that are to be monitored during the registration and accreditation process to include governance and teacher accreditation agency registration. At the same time, they have reduced the level of feedback provided to schools that might assist in schools' renewal, so that the process is, for the main part, just a compliance check. This is because BOSTES does not have the human resources to provide the extensive responses that would be helpful since the inspectors are usually only at a school for a day. The amount of documentation that is required for this compliance check is excessive.

Finally, AHISA NSW/ACT is concerned that the process of registration is significantly different between independent schools and Government schools. This Association would like to see this inequity addressed, with all NSW schools having the same set of rigorous standards applied.

Curriculum and Assessment

AHISA NSW/ACT is concerned with the growing intrusion and influence of ACARA in curriculum and assessment in this state. AHISA NSW/ACT affirms the need to have one curriculum and assessment authority to determine curriculum and assessment policy in this state. No other state has the depth of curriculum detail and quality as we have in NSW. It is important that NSW schools do not lose all this because of a need for national compromise and concession. We encourage the Minister strongly to reject the national imperative and safeguard the quality education we currently have in NSW.

In particular, we are concerned about the current approach, which is to adopt the Australian Curriculum and then revise and rewrite it to meet state-wide needs. This has led to a reduction of quality. We urge the Minister to embrace a state perspective again, ensuring that we start from scratch to develop curriculum and assessment policies which meet our needs, rather than compromise and negotiate with other states and try to modify the resulting national documents into something which suits NSW. Nevertheless, we applaud the care which BOSTES and its committees have approached the Australian Curriculum – being careful to judge thoughtfully the quality of the documents produced by ACARA and to work out the best way to fit these into the cohesive framework for education we currently have in NSW.

In particular, AHISA NSW/ACT urges the Minister to safeguard the integrity of the Higher School Certificate. While development of an Australian Certificate of Education appears to be in abeyance, AHISA NSW/ACT would be concerned by the adoption or certification of any senior secondary curriculum that rested on political compromise rather than educational rigour.

We, of course, do not agree with everything BOSTES has done! Sometimes we feel that BOSTES is more conservative and slow in setting direction than we would like. There are some of our members who would like to see BOSTES facilitate independent schools adopting other curriculum and assessment programs which meet their particular educational needs and philosophies – such as IB programs, Harvard courses or Cambridge International Examinations, for example, noting that there are legitimate alternative educational pathways for students. Curriculum development could be more innovative to match the global movement in teaching and learning. Some curriculum is dated and we need to be considering STEM, and cross – curricular opportunities for students whilst still maintaining deep learning. Stage 4 and Stage 5 curriculum and Board Endorsed electives could provide more of these opportunities. Stage 6 could also offer the opportunity for other extended courses, which could contribute, to advance standing at university level. But we would prefer a consultative and collaborative NSW BOSTES, valuing all in the various state educational sectors, rather than one which was more centrally controlled and which lost that collaborative approach.

Opportunities

We would like to suggest to the Minister that there are many opportunities for BOSTES to influence education further in NSW. We would like to see BOSTES encouraged to enter into partnerships with various different organisations and institutions to improve knowledge and skills, encourage research, and facilitate positive developments in education. We are thinking about partnerships with universities, for example, in the training and development of teachers. In particular, AHISA NSW/ACT sees a role for BOSTES in developing and delivering a program to equip teachers with mentoring skills, especially to assist pre-service teachers in practicum placements and graduates on their first placement.

Another possibility is to partner with the Education Research Council of AIS, or AHISA directly, for example, and of course similar committees of the other school sectors within NSW. A third area might be to use the expertise of the Office of BOSTES to train and develop educators, say in the use of data to make good educational decisions for students, the use of psychometrical data to inform good practice, etc.

Consultation and Collaboration

Finally, we want to applaud BOSTES for its collaborative approach throughout the 26 years of its existence. We understand the difficulties of being both a consultative body (when it comes to things like curriculum design and development) and a regulatory body (for aspects such as registration of schools and accreditation of teachers). In the main, we feel that BOSTES has negotiated these dual roles admirably.

BOSTES to their credit provides us with the opportunity for considerable consultation and collaboration. AHISA's Academic Committee meets with the President and key personnel of BOSTES each term, to discuss BOSTES initiatives and concerns/questions raised by the AHISA membership. These meetings are not just 'lip service' to consultation and collaboration - BOSTES is clearly taking on board the views and experience of our sector. They are to be lauded for this approach. The provision of face-to-face and online consultations also works well, particularly the scheduling and location of briefings in non-metropolitan settings. BOSTES staff are also available to meet with large professional gatherings, such as Directors of Curriculum Conferences on a biannual basis. We encourage the Minister to value this collaborative approach, and indeed, to strengthen it by giving BOSTES a suitable timeframe for a consultative approach at every level and to provide it with the resources needed to ensure that collaborative functions are completed effectively and that the regulatory functions are executed supportively and flexibly.



Paul Teys, on behalf of the Executive of AHISA NSW/ACT

Chair

AHISA NSW/ACT