

# **Education and Health Standing Committee's Inquiry into the Department of Education's Independent Public Schools initiative**

## **WA Council of State School Organisations Inc. Submission**

**15<sup>th</sup> April, 2016**

### **ABOUT WACSSO**

The Western Australian Council of State School Organisations Inc. (WACSSO) is the peak body representing parents of public school children in Western Australia. WACSSO provides services and representation at State and National level to 649 Parents and Citizens Associations (P&Cs), four school boards and three school councils<sup>1</sup> in Western Australia. WACSSO is largely a volunteer organisation made up of a President and State Councillors (representatives) from geographically-based electorates and as such, the organisation has a wide representative reach across the state.

We are pleased to have been invited to provide a submission to this inquiry. This submission deals with the seven terms of reference and some additional points within the scope of the organisation's representation of parents of public school students across the state.

Please note this submission has been compiled with the assistance of reports from a number of WA public schools and P&C Associations. WACSSO has agreed to protect the anonymity of individual schools as most have raised concerns about possible ramifications for themselves personally or for their children.

### **CONTACT**

Ms Kylie Catto, WACSSO President

0477 644 000, [president@wacssso.wa.edu.au](mailto:president@wacssso.wa.edu.au)

### **ABBREVIATIONS**

|            |                                                               |
|------------|---------------------------------------------------------------|
| Board      | School board                                                  |
| DPA        | Delivery and Performance Agreement                            |
| DES        | Department of Education Services                              |
| Department | Department of Education                                       |
| IPS        | Independent Public School/s                                   |
| P&C        | Parents and Citizens Association                              |
| WACSSO     | Western Australian Council of State School Organisations Inc. |

## INTRODUCTION

Following the announcement by government of the IPS initiative in 2009 WACSSO immediately raised concerns via correspondence with then Minister for Education Hon. Dr. Elizabeth Constable MLA that the timeline allowed for schools to submit information for the initial 2010 intake was too short for schools to adequately consult with their communities<sup>ii</sup>.

Since initial implementation, the main focus for WACSSO has been identifying any positive impact on student outcomes, as it is this organisation's view that an improvement in outcomes and student educational experience should be front and centre when government is considering any type of reform. WACSSO did not support the widespread implementation of IPS without a proper trial and review process, which unfortunately did not occur, as subsequent increasing numbers of schools have been added to the program each year. WACSSO supports local management of government schools to the extent that it is supported by the school community and allows schools to make decisions which enable them to adapt the delivery of education to their local conditions.<sup>iii</sup>

### **A. The implementation of the initiative, including support provided to schools transitioning to become independent public schools and the use of delivery and performance agreements.**

Since the first wave of 34 schools were accepted into IPS in 2010<sup>iv</sup> a further 411 schools have come on board taking the total number of IPS schools operating in Western Australia to 445. It is important to note that during this time, a number of major educational reforms and changes have occurred, including the transition of Year 7 students into the secondary school environment, changes to WACE requirements, significant school budget reductions, the new Student Centred Funding Model and the transfer of all school accounting to the 'one line budget.' All of these factors impact both IPS transition and the relation of IPS and non-IPS in some way.

#### **Early feedback (2011)**

In June 2011 WACSSO sought feedback from affiliates about their early experience of IPS implementation.<sup>v</sup> At that time the response was mixed. In some schools, parents reported that IPS had allowed the wider community to have a greater impact on the direction of the school to better meet the needs of its students. In other schools, parents reported that little had changed from their perspective. Responding schools consistently reported a government-level failure to clearly define potential IPS impacts, rather relying on individual schools to educate parents on the details and implications of becoming an IPS, which unfortunately was not occurring equally amongst schools.

Responding schools listed greater local governance of the school and greater control of its use of resources to ensure they meet the varying needs of each student as benefits. They raised concerns about the potential for establishing a second tier of schooling within the public school system which would create competition and inequity unsuitable for a public school system.

#### **Funding certainty**

One impact is particularly evident in the case of schools that entered into IPS Delivery and Performance Agreements (DPAs) prior to the announcement of state government funding cuts to education in August 2013. Aligned with the DPA is the three-year strategic Business Plan, signed off by the board chair. Business Plans set out specific student achievement targets informed by the

expected level of resourcing and support deduced at the time of the Plan's development. The State Government's announcement of funding cuts in August 2013 was abrupt, unexpected and unwelcome. In fact resultant from the release of the long-awaited Teese Report, based upon the author's recommendation that additional funds flow into the education budget<sup>vi</sup>, wide-ranging cuts were revealed, of up to \$250,000 per year for four years for the worst affected schools. Schools were given no warning of what lay ahead. Boards of IPS on the receiving end of cuts, that were already part-way through their three-year DPA and Business Plan found themselves increasingly concerned at their ability to fulfil their agreements. A number of boards made serious enquiries to WACSSO querying known avenues for rescinding or modifying their Business Plans but it seemed that largely there was no mechanism available for them to do so. Where there is the expectation by government that schools commit to long-term outcomes-based agreements, government must support this by providing certainty that there will be no shifting goal-posts that threaten to set schools up for failure due to unexpected changes.

### **Support for principals**

It is universally accepted that the skills and attitude of the school principal is an important factor in the perceived success of an IPS. In fact the Principal may be *the* most important factor. Melbourne University's 2013 Evaluation of the Independent Public Schools Initiative found a major contributor to the adoption of autonomy is the school principal's mindset, "as it is during this phase that the principals gather the necessary resources, information and skills required to commence and implement the initiative."<sup>vii</sup> During the application and transition stages, there is a strong emphasis on information and training for the Principal and school council chair. The IPS evaluation found that principals' workloads increased upon transitioning to IPS.<sup>viii</sup> The review asserts that principals were generally accepting of the extra demands because they were leading the change, but states that this acceptance "might change if more principals apply because they feel obliged to rather than because they are personally motivated to."<sup>ix</sup> The same report found the prime reason principals pursued IPS for their school was the ability to select staff.<sup>x</sup> With the proportion of staff in IPS (>70%) than not-yet IPS schools in Western Australia steadily increasing,<sup>xi</sup> WACSSO has found that a greater number of principals are in fact citing an obligation to move to IPS purely to achieve what is perceived as the superior staff selection opportunities over a dwindling centrally funded staff group and redeployment pool, and not because of they are embracing the concept and ideals of the IPS initiative. Herein lies a danger for school communities that any IPS-related benefits may not be realised.

There is further concern in situations where a principal vacancy arises at an existing IPS that is filled by a principal with no IPS experience. The extent of principal resourcing and knowledge gained from the initial transition process is not replicated, so it is imperative that sufficient support is provided to these principals.

### **Training for board members and board nominations**

IPS boards are comprised of parents, staff and members of the community,<sup>xii</sup> each of whom has an individual and varied skillset. Department of Education information states a comprehensive introduction is provided for members, but anecdotal evidence suggests this is not always the case. Reliance on an already overworked principal and board chair to deliver the board's sole induction

and training is suboptimal. Given the high level of responsibility and accountability vested upon members, quality training at Department level should be provided.

WACSSO has received reports from numerous schools regarding the process of nominations for board positions. Parents are questioning what if any process exists. It appears that at all of the schools WACSSO has been contacted by, nominations have been taken on an ad hoc basis, without a formal 'call for nominations' to the school community and that often in replacement of an election period that board members are hand-picked. There seems to be no consistency between schools. To maintain integrity and transparency of the board, a standard enforced procedure is required.

## **B. THE ONGOING ROLE OF THE DEPARTMENT OF EDUCATION, AND OTHER AGENCIES, SUPPORTING INDEPENDENT PUBLIC SCHOOLS.**

### **Changing school populations and administrations**

Any school applying for IPS must meet a particular set of criteria based on the ability to increase responsibility for its affairs, attain staff and community support and demonstrate potential benefits to the school community.<sup>xiii</sup> The process is moderated to an extent for new schools, all of which are automatically IPS, as there is obviously little opportunity to provide evidence of meeting such criteria. But what happens in the case of existing IPS, where there is a significant population change, due to a boundary change, or a change in school leadership that impacts the school's direction? There is a distinct possibility that due to one or more of the reasons above a school could become less aligned with the aims, requirements and obligations of IPS.

WACSSO is unaware of any situation where a school has been removed or has removed itself from the IPS program; however WACSSO is aware of situations where leadership changes have impacted a school's ability to manage its affairs, and to maintain community support for such a strongly principal-driven system of schooling.

### **IPS in rural and remote settings**

IPS boards can have significant influence on the school and its community - participating in endorsement of the DPA, development of the school's annual report, budget and business plan and school reviews. The board has potential as a positive avenue for effective communication and engagement with the broader school community.

Considering the obligation and accountability placed on IPS boards and the administration teams they work with, it is essential that training and development be ongoing and includes the ability to identify areas of need and address them promptly. Whilst an initial induction is available for all board members the Department must ensure that there is deliberate implementation of effective and ongoing support and training, especially those schools that are or will be servicing rural and remote communities.

Currently the majority of small remote schools are non-IPS. Consideration must be given to the eventuality that more of these communities will want to embrace IPS ideology. Showcased as the ideal platform for education, the Department promotes the IPS system as "a powerful combination of local autonomy and central support to deliver high quality, tailored and distinctive education



experiences for staff, students and parents,”<sup>xiv</sup> highlighting a list of the benefits of becoming such a school. The Department promises “highly specialised board training covering all aspects of effective governance.” Rural and remote schools must be considered fairly and equally when seeking the IPS opportunity that their metropolitan counterparts have available to them. Supporting IPS and their boards in overcoming significant factors that can be associated with rural and remote communities will need to be considered.

Regional Education Offices provide an opportunity for effective support to IPS and are placed to understand the local landscape impacting their schools. In 2011 Department restructure saw 14 education districts rationalised to eight education regions with individual offices tasked with providing support to schools, staff and the community. The restructure has meant that Education Regional Offices are faced with an increased diversity of schools and student population to support. As a way of managing this diversity and addressing the needs of local school communities’ principals, staff and P&Cs; School Councils and School boards are “...being given greater control over the direction of their schools and how services are used to benefit students. The majority of support services essential to schools, such as school psychologists, participation officers and curriculum support has moved to schools or networks of schools. This will give schools greater capacity and flexibility to make decisions about how best to use those services and resources.”<sup>xv</sup>

Considering the “greater control” that schools and their communities are now tasked with, who will take up that fundamental on-the-ground support? ‘Supporting the supporter’ becomes essential when the Department considers funding and staffing of its regional offices. Government funding to health services and the way they connect with schools is a vital voice in the conversation when we look at education. When seeking services in rural areas the IPS will find itself in a competitive and stretched market. Government funding cuts across community and health services results in access to essential support for families becoming more and more difficult to obtain. For a number of reasons schools are often being required to fill the gap. No longer is education the core business of our schools, as they are increasingly being asked to address the physical, mental, social and emotional needs of students. The rise of Breakfast Clubs, parent support rooms, family language programs, school psychologist services, speech therapy etc. has been significant. These are all considerations of IPS boards that will question ‘how do we meet the vision of excellent education for the children who attend our school?’ Place that school in a rural or remote area and the need significantly increases as does the requirement for external support to help them achieve their vision.

### **C. HOW INDEPENDENT PUBLIC SCHOOLS ARE MONITORED THROUGH INFORMAL AND FORMAL REVIEW PROCESSES AND THE TRANSPARENCY OF REVIEWS FOR THE SCHOOL COMMUNITY.**

Review findings from the three-yearly independent review process are available on school websites, though some parents are reporting a lack of ease of locating these reports online. One school reported positively on the principal’s active engagement with the school community around the review report. Reports have been received of high satisfaction with the IPS process in general and particularly the extent of support received around implementation and the increase in community engagement around the decision-making processes of school.

Concerns have been raised around the formal review process. A number of suggestions have been provided for improving this process, to ensure that schools' individual views of the IPS program generally are accounted for within the review.

Concerns were raised around the transparency of a review process which appeared to have no known formalised process, or at least, a process was not communicated by the reviewers or by the Department of Education Services (DES), the reviewing authority. A lack of clear understanding of any priorities or scope for the review was reported. One school deduced from the reviewers' line of investigation that NAPLAN results were a major focus, but felt that there was a lack of interest in achievements as a 'whole school' and those areas that the school itself felt were important or strengths.

There was reported dissatisfaction that the review process was less like a partnership process of review between the school and DES and more like a direct judgement of the school, with an 'Expert Review Group' (ERG) feel. Reports were also received that some reviewers did not have contemporary experience within public schools and that this would be a recommendation to DES for the selection of reviewers in future.

Concerns have been raised about the lack of a process to deal with grievances with the review process and/or review findings. Whilst the opportunity is available to highlight factual errors in the report document, there are concerns that reviews have been finalised with unresolved factual inconsistencies.

There have been reports of disappointment and lack of ownership of the review. What was believed to be a largely positive and constructive process turned out to be disempowering and disheartening. There appears to be a general sentiment across the sector that review results will depend majorly on 'who' conducts the review, rather than a review based on the fulfilment of clear requirements. There are also concerns around disconnect between the review's NAPLAN-heavy focus and the Department of Education's current focus on a holistic education.

Based on communication between schools around the IPS review process, a concern has arisen that various stances and approaches are taken by different review teams, further expanding on the view that the reviews lack a clear vision and process that can be communicated to both the review teams and to the schools being reviewed.

#### **D. THE IMPACT ON THE ENGAGEMENT AND PERFORMANCE OF STUDENTS, IN PARTICULAR THOSE WITH ADDITIONAL NEEDS.**

It is this organisation's view that any initiatives implemented into public schools must have as their first priority improvements in student outcomes, which align directly with improvements to teacher quality and pedagogy. Given that all public schools in Western Australia transitioned to a one-line-budget in 2015, the sole point of difference operationally between IPS and non-IPS is staff selection. Teacher training does not discriminate between teachers who will work in IPS and non-IPS schools, therefore teaching skills should be fully transferrable between school types. The negative perception of centrally funded and redeployed staff that has arisen from IPS is a separate issue and will be discussed further at 'G.'

The Melbourne University IPS evaluation found no evidence of student outcomes improvement that was attributed to IPS.<sup>xvi</sup> Given the short timeframe between the implementation of the IPS initiative and the review this is to be expected, with the report stating IPS-attributed outcomes changes may not be evident until five to eight years after the implementation. This year marks the sixth year since the implementation of IPS so further comprehensive independent review at this time would be beneficial in beginning to understand whether Western Australia's IPS initiative really can impact student outcomes.

Analysis of NAPLAN results could provide an indication of IPS impact on student performance. WACSSO is mindful of a negative impact resultant from IPS, which is the creation of a 'two-tier' public education system, however the differentiation between IPS and non-IPS NAPLAN data, if used in a sensitive manner, would be useful in substantiating any difference in student outcomes. If data reveals that IPS are improving at a higher rate than non-IPS, we must identify why and use these findings implement changes into other schools. Data and information sharing between schools is paramount in removing competition between schools and between IPS and non-IPS and will provide long-term benefits to the system as a whole, which should be another key aim of reform of this type.

#### **E. THE OUTCOMES OF FORMAL AND INFORMAL REVIEWS OF INDEPENDENT PUBLIC SCHOOLS.**

DES material states that Independent Review findings are returned to the principal and board chair to fact-check for accuracy before final adoption. However as stated in 'C' a formalised appeals or grievance process for schools that feel that their review findings do not accurately reflect what they understand to be happening at the school seems to be lacking. There is suggestion that review panels are non-receptive to challenge. A formal process of appeal should be available to schools, which must be clearly communicated to the board.

#### **F. THE PROCESS AND EXTENT TO WHICH THE DEPARTMENT OF EDUCATION INCORPORATES REVIEW OUTCOMES INTO ITS MANAGEMENT OF THE INDEPENDENT PUBLIC SCHOOLS INITIATIVE AND ENSURES THAT INDEPENDENT PUBLIC SCHOOLS ACT ON REVIEW OUTCOMES.**

Two schools have reported to WACSSO regarding DES follow-up from IPS review. One Perth metropolitan primary school spoke positively of the follow-up process, including regular email correspondence between the principal and DES. Another metropolitan primary school P&C Association reported that of the areas identified for improvement within the review report, one included the prioritisation of a particular infrastructural project, in order to meet the national Quality Standard. The P&C was approached with a sense of urgency to provide significant funds for the project, which it did. However many months later the project appears to have stalled completely. A clear follow-up process for schools seems to be lacking, or if a process is in place this is perhaps not being clearly communicated to the school community.

#### **G. THE IMPACT OF INDEPENDENT PUBLIC SCHOOLS ON STAFFING ARRANGEMENTS.**

Until the end of 2014 there were a number of marked operational differences between IPS and non-IPS. All schools transitioned to a one-line-budget in 2015, making staff selection the standout difference operationally between the school types. Allowing schools to have the choice over acceptance of redeployees has shown a number of negative consequences. Centrally funded and redeployee staff are often unfairly perceived to be of lesser value, therefore schools that are not-yet IPS are often viewed as providing a lesser-quality education, though as previously discussed there is no evidence to support this perception.

Staff selection has a major influence on schooling in regional areas. Inequalities arise where the only school in a town is non-IPS, where IPS and non-IPS schools exist together in a town or in adjoining towns, or more severely where there are multiple schools in an area and only one of these is not yet an IPS. Competition is created between schools due to a number of factors. Generally speaking and somewhat unfortunately, the negative perception of non-IPS staff makes the IPS more attractive to parents than the non-IPS. Since its introduction the state government has held the IPS initiative as its shining light achievement and due to this IPS has become something of a status symbol. Many IPS principals use IPS status as a point of difference when advertising their school to prospective parents, and there are cases where principals go further in promoting IPS staffing selection advantages as a point of difference. This unfairly disadvantages non-IPS schools.

It is important to remember that Western Australia has one government school system (though acknowledging that independent and catholic schools receive public funding) - it would be of benefit to all students if the public school system was considered holistically.

## H. OTHER RELATED MATTERS

### **Impact of IPS on community engagement**

When the IPS initiative was launched there was a clear focus on community engagement as a fundamental criteria for acceptance, indeed principals must provide clear evidence of community support. It is this organisation's view that there has been no improvement in community engagement as a direct result of IPS. Where community engagement within a school was operating well prior to IPS, schools seem to have capitalised on this with positive results. However, increasingly reported to WACSSO are situations where principals are diminishing genuine community engagement as a result of IPS status. It is important to note that these situations are presumably a minority of cases however that it is occurring at all is incredibly disappointing. Some principals view the IPS initiative as an opportunity to have the board as the sole school organisation and to diminish the value and role of Parents & Citizens Associations (P&Cs) within the school community. WACSSO has also received a report from a P&C President that the first they had heard about the school becoming an IPS was when they read the announcement in the local paper. This does not reflect a focus on community engagement.

In 2013 the Director General issued a directive to school principals outlining the legislated role and the value of P&Cs to schools. This was available on the Department's website until recently. The Director General published a column in WACSSO's P&C Voice magazine in Term 3, 2014, stating that "the important role and functions of parents and citizens' associations in schools remains unchanged."<sup>xvii</sup> Unfortunately WACSSO continues to receive reports from schools where principals have indicated that the P&C is surplus to requirements. This is particularly evident where a new



principal has transitioned to an IPS school. Schools must be made aware of the differing and equally valuable roles of the board and the P&C.

### **The two-tiered system**

A two-tiered system of schooling arose as an unintended consequence of the IPS initiative, in the way schools with IPS status and their staff were promoted as superior by government and subsequently by many principals. In 2015 with the introduction of the One Line Budget, the differences between IPS and non-IPS diminished. As the IPS list increases year to year, those schools 'left behind' are thrust further into inequity. When Public Private Partnership (PPP) schools come online in 2017 there is a danger of the creation of a third-tier; the PPP IPS. How will government act to ensure all schools are promoted and treated equally under our single public school system?

### **Communication and engagement**

Over time WACSSO has noticed changes in the attitude and promotion around IPS from a Department and government level. In particular, there is disconnect between the language used on the website and in the 2017 IPS Prospectus. As previously mentioned a directive from the DG regarding the place of P&Cs in government schools has been removed from the Department's website. The website now seems to be devoid of reference to the importance of community engagement around IPS and no longer features a parent FAQ. Where a criterion for IPS selection is the level of local support, this must be reflected clearly via relevant information across all communication channels.

### **Shifting accountability**

A significant impact of IPS in a time of economic uncertainty has been the changing face of accountability. With autonomy comes a shifting of accountability from the body giving to the body receiving the element of control, in this case from government, to the school board and principal. Since the implementation of the IPS program and more recently across the board the one-line-budget, there have been numerous instances where concerns raised by schools and in the media about lack of resources to provide for example, Education Assistant time or where programs have been cut due to budget reductions, have been met with the response that *principals* and boards now prioritise where funds go within the school, thus deflecting from the larger issue of funding inadequacy. A sense of realism must be returned to this debate.

## **CONCLUSION**

Thank you for taking the time to consider this submission. In summation WACSSO accepts that the majority of schools appear to have found that the IPS program has allowed them to better meet the needs of students. WACSSO is particularly keen to see future evaluation of any correlation between IPS and student outcomes and is eager to see the learnings and practises of successful IPS schools shared with the entire public school community for replication where appropriate. We believe the IPS review system should be reviewed to ensure a transparent and consistent process for all schools.

Western Australia is filled with strong, successful and student-focused public schools that should be celebrated and promoted, and importantly resourced equitably, regardless of IPS status. More care must be taken from a government level when communicating to the school community and general

public about the perceived value of particular schools and staff, in order to reduce the detriment of a two-tier and soon to be three-tier, system of schooling.

---

<sup>i</sup> Western Australian Council of State School Organisations Inc. Data accurate as of 5<sup>th</sup> April 2016.

<sup>ii</sup> Western Australian Council of State School Organisations Inc. Letter to Hon. Liz Constable MLA, Minister for Education. Dated 2<sup>nd</sup> September 2009.

<sup>iii</sup> Western Australian Council of State School Organisations Inc. Policy. H5. Local Management of Government Schools.

<sup>iv</sup> University of Melbourne. 2013. Evaluation of the Independent Public Schools Initiative. P11

<http://www.education.wa.edu.au/home/detcms/navigation/about-us/programs-and-initiatives/independent-public-schools>

<sup>v</sup> Western Australian Council of State School Organisations Inc. Letter to schools requesting IPS feedback. Dated 2<sup>nd</sup> June, 2011.

<sup>vi</sup> PerthNow. July 20, 2014. WA schools need more money, not funds transfer, says funding system reviewer Professor Richard Teese. <http://www.perthnow.com.au>

<sup>vii</sup> University of Melbourne. 2013. Evaluation of the Independent Public Schools Initiative. P7

<sup>viii</sup> University of Melbourne. 2013. Evaluation of the Independent Public Schools Initiative. P32

<sup>ix</sup> University of Melbourne. 2013. Evaluation of the Independent Public Schools Initiative. P32

<sup>x</sup> University of Melbourne. 2013. Evaluation of the Independent Public Schools Initiative. P25

<sup>xi</sup> Department of Education. New Opportunities for 2017. Independent Public Schools.

<http://www.education.wa.edu.au>

<sup>xii</sup> Department of Education. Boards of Independent Public Schools. Independent Public Schools.

<http://www.education.wa.edu.au>

<sup>xiii</sup> Department of Education. Opportunity to become an Independent Public School in 2017. P3

<sup>xiv</sup> Department of Education. Independent Public Schools.

<http://www.education.wa.edu.au/home/detcms/navigation/about-us/programs-and-initiatives/independent-public-schools>

<sup>xv</sup> Department of Education. New Ways of Supporting Schools.

<http://www.det.wa.edu.au/regions/goldfields/detcms/navigation/about-us/>

<sup>xvi</sup> University of Melbourne. 2013. Evaluation of the Independent Public Schools Initiative. P72

<sup>xvii</sup> Western Australian Council of State School Organisations Inc. 2014. Message from Director General of Education. P2.

WACSSO