Shifting the balance:
Increasing the focus on teaching and learning by reducing the burden of compliance and administration

Review to reduce red tape for teachers and school leaders

December 2020

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Executive summary

This review is first and foremost about reducing the amount of time school leaders and teachers spend on non-teaching, non-learning or non-leadership tasks so they can focus more on teaching, learning and leading which will ultimately improve student outcomes. There is a growing body of evidence that indicates school leaders and teachers are spending increasing amounts of time on compliance and administrative tasks. Reducing the amount of time teachers and school leaders spend on compliance and administrative tasks will free up teachers' and school leaders' time to focus on the activities that have the greatest impact on student growth and achievement.

The Australian Government Minister for Education, with the agreement of Education Council, tasked the Australian Institute for Teaching and School Leadership (AITSL) to undertake a review to reduce red tape for teacher and school leaders, in partnership with states and territories. A key aim of the review has been to identify the ways in which jurisdictions, sectors, and schools are reducing 'red tape' for teachers and school leaders, with a view to sharing better practice approaches.

The research and consultations for the review found that most jurisdictions, systems and sectors in Australia have a focus on or processes underway to reduce the impact of 'red tape' on their schools. The review profiled a selection of case studies to highlight initiatives and practices undertaken by systems and sectors to reduce the administrative burden on schools. It identifies the key factors that can inform future policy and practice and allow for the sharing of good practice across sectors and jurisdictions.

This includes a combination of approaches, from strong central coordination in a big department to ground up sharing of good practice in how to support schools to reduce the impact of administrative and compliance arrangements. The case studies also illustrate stakeholders' perspective that Australia's school education system structure underpins many of the problematic aspects of regulation and the red tape burden on schools (such as overlapping Commonwealth, state and territory responsibilities, and differing governance arrangements across sectors).

There is evidence in the case studies and in research that cross-sectoral cooperation within states and territories is a key part of a successful approach to the reduction of the red tape burden particularly on non-government schools. Ongoing consultation,

quality communication and inclusive co-design underpin many of these successful initiatives.

Features of successful red tape reduction efforts

Design	Implementation
• Integration of red tape reduction into regulatory and policy making processes • Undertake explicit efforts to reduce duplication • Co-design and communication • Adoption of risk-based approaches	• Making better use of what already exists • Technology enhanced regulation and practices • A consistent focus on red tape reduction • Ongoing consultation and feedback with school leaders, teachers and sectoral representatives

This report identifies broadly the Commonwealth and state and territory compliance and administrative requirements that are experienced by schools. Consultations revealed the importance of considering the context, both broader and education specific, and implementation challenges. It also outlined the primary sources of the compliance and administrative requirements, including those linked with government regulation, policy, and reporting requirements; increased administrative and accountability requirements supporting increased school autonomy and in-school practices.

The report outlines how the compliance and administrative requirements have been operationalised at the school level. This supported the review to advise on the better practice used in jurisdictions and sectors to reduce red tape, taking into account local context on how these requirements are operationalised, including efforts to reduce compliance requirements, coordinate and streamline their impact in schools, and improve how schools meet these requirements to free up teacher and school leader time. This also assisted the review to recognise the various approaches or ways to operationalise the requirements and helped to better understand how the burden falls to principals and school leaders and the ways this can cascade to teachers and school staff.

The issues that have been identified through the research and consultations are presented under six broad themes. The identified issues are inter-related, as there is

no singular issue or cause but rather a range of issues that are part of the burden on schools.

The potential solutions are presented as national actions, where they relate to Commonwealth requirements and/or responsibilities, and better practice approaches, where they relate to and highlight better practice that is relevant and/or applicable for all jurisdictions, including the Commonwealth, sectors and schools to consider. Red tape reduction is a continuous process, and the review is therefore seeking to establish clear processes that will support this over time through a collaborative, cooperative and coordinated approach.

National actions

1	A national framework, forum and mechanism to consider the cumulative impact of the requirements on schools
2	Establishment of a national policy and advisory library
3	Consider opportunities to streamline or trial alternative approaches in key areas
4	A toolkit that enables schools to develop a process to review and redesign their own practices

Introduction

There is a growing body of evidence that indicates school leaders and teachers are spending increasing amounts of time on administrative tasks. This has broad ramifications for school leaders and teachers, and affects both those working within the profession and its attractiveness to those outside it. The inquiry into the status of the teaching profession identified alleviating out-of-hours work undertaken by teachers and improving administrative support within schools as among the five key themes for attracting, retaining, and developing Australia's teachers (House of Representatives Standing Committee on Employment, Education and Training 2019).

Ninety three per cent of teachers in Australia cite the opportunity to influence children's development or contribute to society as a major motivation for joining the profession (OECD Teaching and Learning International Survey 2018). Teachers are our nation builders and the strength of every profession in our country grows out of the knowledge and skills that teachers help to develop in our children. Teachers and school leaders deserve recognition, appreciation and support of their work.

School leaders continue to report that their main sources of stress are quantity of work, lack of time to focus on teaching and learning, and student mental health (Riley 2020). Indeed, one recent, large-scale Australian study into public and teachers' perceptions of the teaching profession (Heffernan et al. 2019) revealed that teachers' concerns about their workload influence their intention to leave the profession.

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"Every minute a teacher or principal is carrying out functions that can be performed by the System, no one is attending to the student-parent relationship. Every time a school staff member has to reinvent a solution to a problem solved elsewhere, that is wasted time."

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It is important that teachers and school leaders are enabled by systems and sectors to spend their time on the activities that have the greatest impact on student growth and achievement. Compliance and administrative activities and approaches should not represent a burden that undermines the work of teachers and school leaders.

To address this issue, the Australian Government Minister for Education tasked AITSL to undertake a review to reduce red tape for teacher and school leaders, in partnership with states and territories. Education Council approved the Terms of Reference for the Review (Attachment A) at its December 2019 meeting.

Approach to the Review
Scope

This review is underpinned by the premise that requirements placed on schools exist for a reason. Many are essential to promote the provision of quality education through good governance, strong financial management, an effective curriculum, sound teaching practices, and a safe and supportive environment for children. This review is intended to learn from the jurisdiction, system, sector, and national processes already underway, to identify the ways that schools and jurisdictions work to reduce red tape for teachers and school leaders and seek to review and reduce this regulatory burden, with a view to sharing better practice approaches.

The endorsed Terms of Reference determined the focus of the review. The review, through consultation and research, sought to:

- Identify (broadly) the Commonwealth and state and territory compliance and administrative requirements that are experienced by schools.

- Advise on the better practice used in jurisdictions and sectors to reduce red tape, taking into account local context on how these requirements are operationalised, including efforts to reduce compliance requirements, coordinate and streamline their impact in schools, and improve how schools meet these requirements to free up teacher and school leader time.

- Highlight best practice approaches in jurisdictions, systems and sectors that have potential national application.

- Recommend national actions.

The scope of the review included consideration of existing and potential approaches being adopted by schools and jurisdictions to reduce red tape for teachers and school leaders, including improving the effectiveness and efficiency in how red tape is met.

The scope of the review excluded consideration of:

- Whether particular compliance requirements are justified or necessary.

- Aspects of teacher and school leader time use that have implications for matters which are specified in industrial agreements.

- A process for implementing any recommendations from the review.

The review's Terms of Reference notes that 'red tape' refers to the compliance requirements faced by schools. While this review does not seek to explicitly identify which compliance and administrative requirements experienced by schools are considered red tape, it is premised on the notion that the burden of red tape is associated with any unnecessary and undue components of the requirements. Regulation is required to help reduce risks, protect the rights and safety of students, and support the delivery of quality education.

Regulation, therefore, will always be required. However, it needs to be regularly reviewed, to ensure that it still meets its purpose with minimal disruption to processes and activities. The regulation review approach adopted should also include principles of good accountability, such as clearly defined and agreed roles and responsibilities, clear performance expectations, balanced expectations and capacities, credible reporting, and reasonable review and adjustment.

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"Regulation cannot be a 'set and forget' exercise. It needs regular and frequent engagement and iterative improvement. Like any other public asset, a school or a hospital, regulation needs ongoing maintenance and monitoring to ensure that it remains fit for purpose and in the public interest." (Greiner 2017)

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Consultation

In line with the Terms of Reference, the stakeholder engagement approach for the review was undertaken in two distinct phases: phase one consultations with jurisdictions and sectors, and phase two consultations with key education stakeholders and the profession.

Phase one

Jursidictions and sectors

Phase one consultation provided rich jurisdictional and sectoral context and detail. It explored issues currently facing systems, sectors and schools in reducing the burden of red tape.

Phase two

Principal associations, teacher regulatory authorities and unions

Consultation elaborated on contextual detail and drew upon experiences of the teaching profession to inform the review. Phase two provided an opportunity to test issues identified in phase one, and to develop solutions for better practice and national action.

Key findings

There are a range of approaches or ways that requirements are operationlised at the school level. approaches are subject to local contexts and circumstances.

There is much variety in the ways in which burden falls to principals and school leaders, and the way this burden can in turn cascade to teachers and school staff.

There is a shared recognition that a reduction in the compliance and administrative burden on schools is an outcome to be desired and worked towards.

A reduction in the compliance burden faced by teachers and school leaders would free them up to focus on activities they consider have the greater impact on student outcomes.

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Definitions

The review is based on the following definitions:

Compliance and administrative requirements

Activities required for schools, teachers and school leaders, and that potentially lessen teachers' and school leaders' time to spend on teaching, learning and leading. This does not imply that these activities are unnecessary or unimportant. Many are essential for student safety, legislative requirements, and community expectations.

Compliance, within this review, does not include activities that contribute to school improvement, such as planning or implementation. It also does not include activities that contribute to improving the quality of teaching and school leadership, such as teacher registration, performance and development, or professional learning.

Burden

The time spent completing compliance or administrative requirements. This does not imply that these requirements are considered 'red tape', but rather that there may be unnecessary or undue components associated with the requirements or with their implementation. Efforts to reduce the burden of requirements should focus on reducing these components, to free up teacher and school leader time.

Compliance and administrative requirements experienced by schools

The literature review and consultations undertaken to inform this review explored the nature and extent of regulatory burden at the school level. This revealed three important points of consideration: context, both broader and education specific; and implementation challenges (see Figure 1). It is critical to acknowledge here that the breadth of compliance and administrative requirements that school leaders, teachers and staff face is well understood by systems and sectors, many of whom have focused efforts to reduce it.

Social Context	Education Specific	Implementation
• Wider social regulation, such as child safety	• Sector differences • Devolution in the government sector • Accountability for increased or specific purpose funding	• Co-design and communication • Technology enhanced regulation • Risk based approaches

Figure 1: The contexts and implementation challenges of compliance and administrative requirements

The various accountabilities toolkits, school compliance calendars and master schedules produced by jurisdictions, systems and sectors illustrate the volume and range of compliance and administrative requirements that school leaders, teachers and staff are required to complete, while simultaneously serving as an example of the

support provided to school leaders to reduce red tape. Compliance calendars help to reduce red tape by enabling all compliance and administrative requirement requests to be scrutinised, to identify duplication and eliminate redundancies.

An example of these calendars is Attachment B, provided by the Association of Independent Schools South Australia. The compliance and accountability information detailed in the calendars pertains to government funding; legislative requirements, including reporting; and registration and accreditation requirements. Such compliance and administrative requirements must be fulfilled by the school on a monthly and an annual basis during a school year.

Other reviews of such red tape have identified the following three main sources of burden in schools:

- government regulation, policy and reporting requirements, including those based on legislation or subordinate instruments, Departmental or external agencies' requirements;

- changing administrative and accountability requirements supporting increased school autonomy; and

- in-school practices, and a propensity for the continual cumulative adoption of new practices rather than replacing old practices with new practices (Caldwell 2000; Macklin & Zbar 2017).

The different funding arrangements strongly influence the regulatory environment that government and non-government schools (Catholic and independent systems/sectors) operate within. Although there are differences across jurisdictions, government schools' concerns with red tape are generally derived from their relationship with their jurisdiction's education department while non-government schools' concerns with red tape are generally derived from their relationship with the Australian Government.

How the compliance and administrative requirements have been operationalised at the school level

The ways that compliance and administrative requirements have been, are, and might be operationalised at the school level reflect a range of factors and priorities. Within their capacity for autonomy, schools adopt a range of approaches to operationalising their compliance and administrative requirements. Decisions about operationalising these requirements are subject to the local context and circumstance, such as school size, sector, and level of autonomy.

Increased expectations of principals in the area of compliance and administration come in the context of the breadth and complexity of the principal's role, as articulated in the *Australian Professional Standard for Principals*. In addition to leading teaching and learning, principals take on significant responsibilities for the pastoral care of their students and communities such as facilitating access to health care, social services, legal support, facilitating employment support for community members, helping community members to receive mental health care and support, and working proactively to support health and wellbeing initiatives within the community (Heffernan & Pierpoint 2020).

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One of the critical decisions facing principals is what can be delegated. It is clear from consultations that principals are looking for guidance and examples of how to delegate effectively.

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Regarding the role of the principal, the Principal Associations made reference to the '40:30:20:10' rule, by which was suggested that 40 per cent of a principal's time should be allocated to working on the future, 30 per cent to instructional leadership, 20 per cent to resources and people, and 10 per cent to daily management. However, consultation also suggested that principals have insufficient time to address the future, and their attentions are necessarily focused on daily management and resourcing. This situation is not conducive to a focus on student outcomes.

One of the critical decisions facing principals is what can be delegated. It is clear from consultations that principals are looking for guidance and examples of how to delegate effectively. In many jurisdictions, the only roles specified in legislation are those of the Director-General (or equivalent) or the school principal. It is not always clear what the implications of this are when the principal is not handling some tasks directly.

Stakeholders reported that many principals feel they must take on all responsibilities directed to them, while others have found ways to delegate some tasks, while maintaining appropriate oversight. In larger schools, it is common to appoint a business manager, or to delegate responsibilities such as quality assurance and compliance to a deputy principal or other senior leader within the school. This has the advantage of freeing up principals' time. However, this delegation is usually easier to achieve in a larger school. Stakeholders reported that the compliance requirements for smaller schools are not significantly less that for larger ones.

School size emerges as one of the most significant factors in how administrative burden is experienced and managed. Small schools with fewer students have reported that the level and burden of these tasks remains consistent and is compounded by the lack of layers of leadership. As a result, the compliance and administrative activities are

undertaken by a small leadership group, often comprising 4 people or fewer, and the time demands on this school leadership group is substantial. In such cases, principals – as well as school leaders – operate between expectations of being leaders of learning and leaders of administration. In these circumstances, the broader system could consider the option of compliance officers to support smaller schools to meet the burden of requirements.

Some principals, particularly in larger schools with more students, are supported by a leadership team which has been expanded and enabled to undertake the range of compliance activities. For example, the role of the compliance manager is a relatively new creation. This and others like it are positions of added responsibility and are a direct result of, and response to, compliance requirements.

Consultation with Principal Associations noted the now commonly used approach to operational risk registers as an example of an innovative development in operationalising and meeting compliance and administration requirements at the school level. Whereas in the past the same cumbersome risk register was used in every school, now it is much briefer and addresses high level risk appetite elements. It emphasises people, reputation, finance, and resources. The contemporary environment today demands attention to these factors, and recognition of priority issues and their impact. A further positive example noted through consultation and review was regarding workforce planning and occupational health and safety support. Some systems have incorporated roles for people with great expertise and knowledge, who are then able to provide targeted support for those at the school level, which helps to reduce some of this burden from principals, school leaders and teachers.

A more sophisticated approach to risk management is an example of bringing a contemporary culture and practices of governance into the schools sector. Opportunities exist in the professional learning space, such as for principals and school leaders seeking to develop their understanding of good governance, or for school staff to capacity-build in operationalising particular requirements. None of this is necessarily quick or simple to achieve; this requires ongoing effort, and the valuing of these tasks for teachers and leaders.

Themes from consultation

Key themes	
1	The scale and breadth of requirements: the cumulative impact of requirements
2	The changing nature of requirements: administrative burden in implementation
3	Coordination: duplication of requirements
4	Communication, collaboration, and co-design
5	Opportunity to streamline or trial alternative approaches in key areas
6	In-school practices: determining what to let go to reduce time on non-teaching and learning tasks

Theme one – The scale and breadth of requirements: the cumulative impact of requirements

Stakeholders report that the cumulative impact of requirements is poorly understood and rarely assessed

Australia is largely alone in the structural configuration of its school education sector. The mix of constitutional allocation of responsibilities (states and territories responsible

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for education), a government school sector funded by two levels of government, and a significant non-government sector (34.3 per cent of students in 2019 across Australia) funded by the Australian Government, state and territory governments and also parent fees, is not replicated elsewhere in the world. This has created challenges for schools such as:

- Schools feel the pressure of accounting for multiple sources of compliance and administrative requirements that results from Australia's current structural arrangements.

- Growth in Australian Government funding and specific funding initiatives have led to increased financial accountability regimes and placed additional reporting requirements on all schools.

These developments have resulted in increasing demands on schools that are administrative, financial, compliance related and not directly related teaching and learning. Whilst some compliance and administrative requirements can be encompassed in the regular internal planning and review cycles or usual financial reporting arrangements, others particularly, when driven by specific funding initiatives, have resulted in schools having to develop and provide additional plans and reports.

In addition to the regulatory or legislative requirements that schools must comply with, there are also policy requirements that are mandatory for schools. These include, for example, completion of forms, reports, data collection (such as student census) and other departmental obligations on schools. A distinguishing characteristic of non-government schools is that they may be 'registered charities' or 'corporate entities', which adds an additional layer of regulation as they may also be expected to meet the standards of social and financial accountability applying to 'registered charities' or 'corporate entities'.

Better Practice Approach

Developing, implementing, and utilising school compliance calendars and/or master schedules to support a better shared understanding of the scale, breath and timing of compliance and administrative requirements.

- The development, implementation, and utilisation of school compliance calendars and/or master schedules supports consideration of the requirements, coordinate compliance and administrative activities and/or requests on schools.

Application of a regulation impact statement (RIS) or similar process to departmental requirements.

- Requirements that are not regulatory or legislative, such as policy or departmental requirements, may not require a RIS or similar processes. Impact statements are crucial and government departments should consider, and assess, the impact of requirements before implementation. This would help to ensure that the compliance/regulatory burden (or impact) of requirements is better understood and potentially reduced.

Compliance Framework and Support: Association of Independent Schools of South Australia

Regulation in South Australia has benefitted from the cooperative work undertaken with the South Australian Department for Education, the South Australian Catholic system and the Association of Independent Schools of South Australia (AISSA). An example of this cooperation is the work that resulted in ensuring that data from the school census can be used by both state and Commonwealth departments without having to be collected twice. Although no formal evaluation on the Compliance Framework has taken place, feedback has indicated that the work is valued by schools and has led to a reduction on time spent on administrative tasks.

AISSA's approach to supporting independent schools in South Australia illustrates how a small member based organisation can realise benefits for its members in the area of regulation by clarifying the regulatory environment, providing access to well organised source documents and resources for schools to meet their accountability requirements and ensuring clear communications both with schools and also with regulators. These arrangements have helped AISSA and member schools deal with both the totality and the changing nature of the administrative requirements they face.

Theme two – The changing nature of requirements: administrative burden in implementation

Stakeholders report that changing requirements, changes to reporting systems and new requests for information are a major part of the burden on schools.

The implementation of new requirements, systems and requests is a continual challenge for schools. Consultations noted not only the breadth of requirements but also the changing nature of the requirements as particularly challenging. This is particularly relevant for technology enhancement initiatives seeking to streamline compliance and administrative requirements. Efforts to streamline need to be balanced with the challenges associated with the changing nature of the requirements and factor in interoperability considerations.

The creation of new systems, which are not integrated, creates an additional burden for schools. Consultations suggested that refinement of existing systems can be preferable to more radical change. Greater opportunity (for the profession to consider the requirement, system and/or request) and time (for planning and communication to reach them) would support teachers and school leaders to better engage with the requirement. Greater use of trialling or piloting was also raised as a means to improve implementation and reduce the burden associated with implementation of new processes and systems.

Better Practice Approach

Application of longer planning timeframes for proposed changes to compliance and administrative requirements to give time for genuine consultation

The changing nature of requirements increases the importance of clear and consistent communication, that explains issues in simple ways and outlines why changes are necessary. Equally important is the provision of initial and ongoing advice and assistance to support school leaders and teachers to understand and acquit their obligations. The purpose of the change needs to be transparent as this can have a positive impact on compliance.

Provision of better practice supports, such as:

- Consultation with the profession to incorporate greater consideration of how policy translates into practice.

- Piloting and user-centred design prior to full roll out of new systems.

- The provision of training and support in the roll out of new compliance and administrative requirements, systems and/or requests.

- A process to consider interoperability considerations in system roll outs.

Theme three – Coordination: duplication of requirements

Stakeholders report that the duplication of requirements is creating a burden for teachers and school leaders

The duplication of requirements and multiple reporting of the same information to different authorities creates workload issues for schools, particularly in the non-government sector. Without coordination and cooperation between authorities the accountabilities for schools can, almost by default, lead to duplication of requirements and additional work at the school level. The multiple sources of regulation, policy and reporting requirements and associated requests for information and data mean efforts to coordinate and reduce the duplication of regulatory requirements can be strengthened by collaboration.

Most associations of independent schools prepare a compliance calendar and education departments also produce a 12-month calendar for information and requirement requests. 'School compliance calendars' set out the relevant compliance requirements and dates for submission and collection of data for applications, reporting and accountability purposes is considered good practice. The development and utilisation of 'school compliance calendars' by all systems and sectors would support improved coordination and timing of requirements and assist to reduce the duplication of requirement requests and reduce the potential for multiple or competing requests over the same time.

Data requests should only be imposed when it is clear that the data is not already available elsewhere. The burden of requests for information and data could also be reduced if the requester had a better understanding of where and who to ask. For example, there are requests from various organisations for school leaders to gather information on teacher registration, however the registration authorities already have this information, and this creates an additional burden for school leaders.

Consultation feedback suggested that many requests for data or information come to schools and principals by default. Some information is typically held centrally, and should a request be directed to an education department in the first instance then the department may be able to respond more efficiently than a school.

Better Practice Approach

Reporting data or information at a system or sector level, rather than the school level, to reduce the burden on schools.

An intra-system and intra-sector process to support regulatory assessment becoming an integral part of policy development within systems and sectors.

- An intra-system and intra-sector process supports better coordination of the compliance and administrative requirements within a system or sector.

- The intra-system and intra-sector process should engage teachers and school leaders through a school-centric approach to draw on their experience and explain "Why they are being asked to do something?" and "How is it going to improve student outcomes?" This provides teachers and school leaders with a clear line of sight to the purposes of administrative requirements and an opportunity to discuss and develop a better shared understanding of the benefits of the requirements for teachers, school leaders and students.

- The utilisation of 'school compliance calendars', which set out the relevant compliance requirements, dates for submission and collections of data for applications, reporting and accountability purposes, improves coordination and assists to reduce the duplication of requirement requests and the potential for multiple or competing requests over the same time.

Better practice example

'Making School Time Count' initiative: New South Wales Department of Education

Since 2018, the New South Wales Department of Education (NSW DoE) estimates to have saved 97 hours per principal, 19 hours per administrative staff member and 6 hours per teacher through the 'Making School Time Count' initiative. Other than time savings through changes/enhancements to information technology (IT) and streamlining of processes, time savings have been made for principals and administrative staff by recentralising some activities (such as payments for utility bills for small schools) and changes to school budget and other cash management processes.

The NSW DoE approach provides an example of actions taken to address the problem of changing requirements, changes to reporting systems and new requests for information that are a major part of the burden on schools. This approach incorporates best practice elements of Integration of red tape reduction into operational and policy making processes and making explicit efforts at coordination to reduce duplication.

Education Management System: South Australian Department for Education

The South Australian Department for Education's Education Management System (EMS) will reduce the administrative burden on schools and simplify processes for staff, parents and students. The department listened to the needs of early childhood centres, preschools, primary and high schools to deliver a new way of working that reduces administration. The EMS is an enabler for school improvement and will streamline and simplify life in schools and preschools to free up staff to focus on helping children to achieve improved outcomes.

Some of the benefits of the EMS include: the streamlining of approval processes (particularly for finance) resulting from the implementation of workflows within the EMS; improved communication between staff and parents (and students) through the portal, smart forms and a learning management system; and reduced duplication of data entry (as the EMS is an integrated system) and improved access to accurate data for decision making using the business analytics tool.

Theme four – Communication, collaboration, and co-design

Stakeholders report inconsistent communication about the intent of regulation and what is required as a cause of red tape burden

A common view across systems and sectors is that more consistent communication and ongoing consultation and feedback regarding regulation and compliance would be helpful. An issue raised by many stakeholders is the concern that some requirements come 'out of the blue' and that there can be mixed messages or a lack of clear

communication about the intent and the details of what is required. Consultation also suggested that sufficient time to implement changes and a clear communication strategy articulating the changes is needed since there is not always a systemic way to get clear and consistent communication to all schools.

Communication needs to ensure that schools understand the purpose of collecting the data and see a benefit for their participation. There needs to be a clear line of sight to the purpose of the requirements and structured advice on how best to meet the requirements.

Early discussions should explore whether existing arrangements can meet the regulatory need, whether a slight modification is needed or whether new arrangements are required that take account of the interests of all parties. Consultation with Principal Associations has stressed the need for clarity about the role of the principal due to its increasing scope and complexity. The work involved in principalship has been described as becoming more complex and requiring principals to be responsible for a wider range of tasks and duties than in the past (Heffernan & Pierpoint 2020).

Better Practice Approach

Consistent communication about the intent of requirements and a clear process for ongoing consultation and feedback regarding regulation and compliance.

Better practice example

Online Student Information: Western Australian Department of Education

The Western Australian Department of Education's Online Student Information (OSI) is a dashboard that gathers and reports on public schools' student information. OSI helps to reduce the time teachers and schools spend on non-teaching or non-learning tasks by making it easier and quicker for school staff to access and use the information they need. OSI does this by bringing together disparate data sets into one easy-to-use dashboard. Often these data sets are available to schools, however the information or data is not contained in one place. Because OSI is student-centric, information automatically moves with the student when they move between schools. This gives schools access to information that allows them to prepare for the needs of incoming students before they arrive.

Better practice example

Rationalisation of policy and creation of a centralised policy platform for schools: Catholic Education Western Australia

Consultation feedback has been overwhelmingly positive in response to the establishment of a central policy platform, and removal of the need to maintain extensive local policies. Schools welcomed the introduction of the searchable Catholic Education Western Australia (CEWA) Handbook that included templates, proformas and online processes. The policy workshops also revealed and defined the level at which principals are equipped to contribute to policy development.

The initiative undertaken by CEWA incorporates efforts at collaboration, co-design and good communication with key stakeholders. The implementation of the initiative has benefited from ongoing consultation with school leaders and their associations and has been enabled through the use of technology to ensure access to and consistency of documentation for all.

Stakeholders report that compliance support is important for improving the efficiency and effectiveness of how regulatory requirements are met

The provision of initial and ongoing compliance related assistance and advice is important to support schools to meet the requirements efficiently and effectively. This is important if school leaders and teachers are going to be supported to meet and maintain their requirements in an efficient and effective way.

Many efforts to reduce the burden of compliance and administration have incorporated technology solutions. These seek to link systems to reduce manual data entry, provide templates and/or generate reports. However, the implementation process needs to include initial training and ongoing maintenance and improvement of not only the system but also the skills of those that use it. The size and geographic spread of

schools in parts of Australia is also an issue for technological solutions both in terms of the reliability of online access and the training of staff in remote locations.

System and sector authorities should also consider how best to support each school to meet their compliance expectations. For example, CEWA has been able to assist schools, through its team of experts based within the metropolitan and regional offices, to meet compliance requirements at a system level and lessen the burden on individual schools, enabling school leaders and teachers to focus on educating students.

A Policy and Advisory Library that bring together all sources of jurisdictional and sectoral policy for schools into a single location, where school staff can easily access policy, guidance and supporting resources would assist to reduce the burden of jurisdictional and sectoral policy on schools.

Better Practice Approach

Establishing a Policy and Advisory Library for schools that brings together all sources of jurisdictional and sectoral policy for schools.

Provision of better practice compliance related assistance and advice, including initial training and ongoing support in a variety of modes and communication which outlines that guidance is just guidance.

Better practice example

Policy and Advisory Library: Victorian Department of Education and Training

As a single policy library that is searchable, accessible and well-written, the Victorian Department of Education and Training's (VIC DET) Policy and Advisory Library (PAL) has had a positive impact on the workload of principals. PAL has received extremely positive early feedback from principals and school leaders but is a continuous work in progress as content is updated and improved to ensure that schools are able to access information that is clear and accurate. PAL has changed the way that principals, business managers and school-based staff access key information that they need to do their jobs. School leaders can now find information quickly, using key word searches or a simple index, and know whom to contact when they have a question. It has brought all policy types and areas together into a single library – putting school users and their needs first in an accessible format that works effectively on desktop and mobile devices.

The VIC DET initiative demonstrates an approach to providing compliance support and advice to schools that is based on co-design and quality communication with stakeholders leading to a significant revision and restructure of a major support element to make better use of existing material, to simplify and reduce duplication and ensure requirements relevant and appropriate.

Theme five – Opportunity to streamline or trial alternative approaches in key areas

Stakeholders report that the Nationally Consistent Collection of Data (NCCD), the provision of education for overseas students, copyright requirements and school infrastructure work requirements can be particularly burdensome for schools

The Nationally Consistent Collection of Data (NCCD) has consistently been raised as an issue in consultations, particularly by non-government stakeholders. A lack of consistency in the application of the post enumeration processes for the NCCD and that the post enumeration process does not account for school context has been noted. The NCCD is an outcome of a national agreement which requires schools to report information about Australian school students with disability.

Schools are also required to collect and report other data on students with disabilities under existing state/territory collections that link to state/sectoral funding and this could be an area where requirements are streamlined to reduce the burden of multiple reporting of the same or similar information and data. However, the need for data to be more resilient and robust before students can transition across to the NCCD was noted in consultations.

Consultations also noted that there is little to no flexibility in terms of NCCD reporting timeframes. This has been compounded by experiences where NCCD data needed to be uploaded on the same day as the South Australian and Victorian census data collections. Changes to the way data is reported can also leave schools without appropriate ways to collect the data. Every school is different and given the complexity in data collection, stakeholders argued for increased flexibility.

How well organised a school is and the application of a better practice approach to documentation processes has been raised as an important element to assist schools to meet the NCCD requirements, as well as change management processes that supports schools through the process. However, many stakeholders consistently held the view that greater equity and alignment between non-government and government schools in regard to what evidence is required could also assist to reduce the burden associated with the NCCD for non-government schools.

The low risk represented by schools in regard to overseas students was also raised by non-government schools who argue that the 'one-size-fits-all' application of policy has resulted in a financial and bureaucratic burden on schools and is a significant disincentive for schools to enter or expand in the overseas student market. It is argued that the low-risk environment should be recognised in compliance and accountability

arrangements for non-government schools enrolling international students. In addition, the duplicative Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registration requirements for vocational education and training (VET) units of study delivered as part of a school course has been an issue previously raised by schools. Stakeholders welcomed the recent streamlining of these arrangements by the Australian Government to reduce the duplicative CRICOS registration requirements.

More positively, non-government schools nationally expressed their appreciation that school registration and CRICOS registration activity are carried out jointly rather than as discrete exercises and information generated by schools can be used for both purposes.

Copyright requirements were also raised in consultations as a particularly onerous task that could be simplified and streamlined to reduce its burden on teachers and administrative staff. It was noted that the Australian education sector, the Australian Law Reform Commission and the Productivity Commission are seeking a fair use provision be included in Australia's Copyright Act, which would replace some of Australia's outdated copyright rules with a simple provision allowing teachers to use freely available digital technologies for the benefits of students.

However, every year a large sample of schools is required to participate in one of several copyright usage surveys. This involves recording and reporting volume and identity of all copyright material used in the survey period. This is an onerous task for teachers and administration staff in schools which could be simplified and streamlined to reduce the burden on teachers and administrative staff.

The procurement processes for school infrastructure works was raised in consultations with some Principal Associations as being particularly burdensome and at least one jurisdiction reported that it is trying to address this issue. The 'red tape' requirements from local and state government were noted as significant regarding school development and infrastructure.

Better Practice Approach

Application of a better practice approach to documentation processes.

Trialling alternative risk-based or proportionate approaches to the procurement of school infrastructure works.

Better practice example

Direct to Market Program: Western Australian Department of Education

Recent reforms to the school system in Western Australia have led to greater empowerment and autonomy of schools, including greater flexibility for schools to procure minor works and maintenance projects. Under a risk-based approach, the Direct to Market (D2M) program is a voluntary program for school staff to directly source contractors to deliver minor works and maintenance projects at the school. The goal of the program is for schools to have greater flexibility in either procuring maintenance or minor works direct-to-market.

The D2M program improves the efficiency and timeliness of procuring and undertaking lower value works. The D2M program is simple to use and consumes less staff time and resources in the procurement of maintenance and minor works. School staff can directly source contractors to deliver minor works and maintenance projects in their school and the program provides schools with greater ability to use school funds to procure works of up to $20,000 (including GST) direct from their local contractors.

Theme six – In-school practices: determining what to let go to reduce time on non-teaching and learning tasks

Stakeholders report that a process to review and determine what to let go is needed at the school level

How school leaders administer and how teachers organise and interpret the different components of their roles, affects the time teachers have for teaching. Whilst schools and teachers have a great deal of flexibility in the way they organise for teaching and learning, they seldom review the efficiency and effectiveness of their own practices to identify whether some of their administrative time can be streamlined and modified (Caldwell 2000; Macklin & Zbar 2017). Principals and school leaders may also set up their own internal requirements to meet their external legal and duty of care requirements, and these can at times increase the burden.

The United Kingdom's (UK) Department for Education's recent initiative of a *Reducing School Workload Toolkit* for reducing red tape in UK schools provides a practical tool that could be adapted and applied in Australian schools. It provides very practical and comprehensive guidance and a variety of downloadable tools that help steer schools through the process of reducing time on non-teaching tasks. The toolkit essentially supports schools to identify and address workload issues in their school and evaluate the impact of their workload reduction measures. This enables schools to manage their own internal processes for identifying and streamlining school practices and in doing so free up time for teaching and learning.

Feedback from Principal Associations suggested that the UK toolkit is a great resource which is simple, usable, and runs across multiple domains and includes clear statements around what, for example, planning is and is not. These resources could generate discussions and support greater consideration of previously 'tightly held' practices' or opportunities for streamlining. Knowing that these conversations are being held across the system would help allay the fears of being targeted. The tools and associated communication could also be used so that all of the community has access to the knowledge that teacher and school leader time is best spent on teaching, learning and leading tasks and not on compliance and administrative tasks in order to optimise student learning.

Stakeholders report that opportunities to share better practice and learn from each other in efforts to reduce red tape are valued

Many schools develop informal or formal networks which can assist with some of the pressure of developing processes. Schools often support each other in terms of

processes and information sharing. This is high value low risk work that facilitates people coming together to look at better practice and learning from each other in efforts to reduce red tape. This includes opportunities to share knowledge on good governance or to collaborate and build capacity in operationalising particular requirements. Consultations noted that the development of networks for schools and Principals can be problematic without support.

How each school supports teachers with compliance and administration varies from school to school based on resources available to them and their context. Information and support can be available on websites, but people value the opportunity to meet face to face or over the phone to talk through the requests and collections. System staff frequently make in-person visits to schools and spend time talking through requirements in detail; this should continue.

An informal 'community of practice' or 'Principals consultative committee' that builds on an existing network would support greater sharing of knowledge and better practice between schools, teachers and school leaders to improve practice. This could also provide as an engagement point for education authorities to support better communication and consultation with the profession. It was suggested by Principal Associations that the Australian Council of State School Organisations (ACSSO), who represent the interests of the families and communities as a parent organisation, could also be included in any such group.

Better Practice Approach

Informal intra-system and intra-sector 'community of practice' or 'Principals consultative committee' to provide opportunities for knowledge sharing and sharing of better practice.

Better practice example

Inter-Diocesan Educational Accountability Group: Catholic Schools NSW

Feedback has indicated that the work is valued by schools and diocesan staff and has resulted in a reduction in time spent on administrative tasks and in "reinventing the wheel" in multiple contexts – schools and diocesan settings. The benefits and positive outcomes are highly valued in particular by officers from smaller regional Catholic dioceses. A key feature of the Inter-Diocesan Educational Accountability (IDEA) Group is the building of working relationships across dioceses to provide a platform for future work.

The group has sought to broaden its expertise by inviting guest speakers to share research at forums and tapping into the expertise of current and ex Principals. The IDEA Group and its approach to supporting Catholic schools in New South Wales illustrates a number of themes identified as successful in reducing red tape including the integration of red tape reduction into regulatory and policy making processes and the use of technology enhanced practices to support both schools and diocesan authorities.

Stakeholders report the increasing use of schools for access to student population is creating a burden for schools

The increasing use of schools as a site for accessing the student population by government, tertiary education and industry for health, research, social campaigning, and other non-core time-consuming activities has been identified as an issue. These non-core time consuming activities are complicated by communication that does not

explain the purpose of collecting the data or benefit of their participation. Requests for information and data can be more efficient and effective if the benefit and outcome are understood.

School systems should consider establishing a process to coordinate, prioritise and approve access to the schools in their system. A more centralised approach to school engagement could reduce the volume, timing and duplication of communications and requests to schools. The process should seek to reduce the burden and be balanced with the need to grant access for appropriate and legitimate activities that contribute towards achieving positive student learning outcomes.

Better Practice Approach

Establishing processes to better coordinate, prioritise and approve access to the schools.

Better practice example

School Engagement function: Victorian Department of Education and Training

The Victorian Department of Education and Training (VIC DET) has a number of centralised resources to assist schools with compliance, including a School Engagement function (formerly called the School Delivery Unit). This aims to reduce the volume, timing and duplication of communications and requests to schools from the VIC DET's central and regional offices while also assessing and advising on workload reduction and other support measures. The key goal was to reduce the number of emails that school leaders were receiving from VIC DET. VIC DET centrally reviews and approves/declines approximately 1,000 requests to communicate with schools annually, from various areas all over VIC DET. This is a 'gatekeeper' role to ensure there is oversight of all areas of VIC DET who are contacting schools about programs, initiatives and opportunities and also to request information, communicate requirements and promote various things.

Shifting the balance: Increasing the focus on teaching and learning by reducing the burden of compliance and administration: Review to reduce red tape for teachers and school leaders

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National Actions

Action one – A national framework, forum and mechanism to consider the cumulative impact of the requirements on schools

The three components comprising this national action are seeking to develop a national framework that utilises an existing forum and draws on existing mechanism (School Compliance Calendars and/or Master Schedules and impact statements) to consider the cumulative impact of requirements on schools, rather than establishing new processes or requirements. The cumulative impact of Commonwealth and jurisdictional requirements is an issue raised by non-government schools in particular, and means that action to reduce burden will be more effective if it is coordinated. Regulation cannot be a set and forget exercise, it needs regular and frequent engagement and iterative improvement to ensure that it remains fit for purpose and in the public interest. Red tape reduction is a continuous process, and this national action is seeking to establish clear processes that will support this over time through a collaborative, cooperative and coordinated approach.

A national framework to consider the cumulative impact of requirements

The development of a national framework to consider the cumulative impact of requirements would assist to develop a better shared understanding of the scale, breath and timing of the compliance and administrative requirements on schools. While there is acceptance across all sectors that schools need to be accountable for funding, safety and security, it is the cumulative impact of the compliance and administrative requirements on schools (from all sources) that is poorly understood and rarely assessed.

The framework would support red tape reduction for schools and systems to implement based on their individual operational requirements and educational programs. It would achieve this by clarifying what each level can do to reduce red tape and outlining what requirements are legislated, mandated, desirable or optional and what departmental

policy must be enacted in relation to the requirements. The framework will draw on existing compliance calendars to collaboratively categorise requirements on schools and outline how systems can work together to reduce the impact. This will assist decision makers in schools and systems.

The utilisation of an existing forum to consider the cumulative impact of requirements

The framework should be supported by a national forum for dialogue between education authorities on the cumulative impact of compliance and administrative requirements on schools. The overlapping Commonwealth, state and territory responsibilities, and the various differing governance arrangements across sectors, have a limiting effect on the ability of individual sectors acting alone to address and ameliorate red tape issues in support of their schools. Ideally, an existing forum would be found to take on this role. The national landscape for education is being reshaped by National Cabinet's recent acceptance of the recommendations of the *Review of COAG Councils and Ministerial Forums* (Conran Review). Providing a forum for considering regulatory requirements should be a consideration in developing new arrangements.

The forum would promote dialogue and collaboration on the requirements, support a better shared understanding of the cumulative impacts on schools and assist systems and sectors to collaboratively reduce red tape in schools. The forum could also provide an opportunity to share learning on red tape reduction efforts as many systems and sectors have initiated, or are soon to initiate, reviews into red tape in schools.

Ensuring the application of an impact statement, similar to a Regulatory Impact Statement (RIS), to Commonwealth departmental requirements and utilisation of these to consider the cumulative impact of the requirements on schools

The application of an impact statement, similar to a Regulatory Impact Statement (RIS), would assist to better understand the impact of changes as well as the cumulative impact of requirements. Requirements that are not regulatory or legislative, such as policy or departmental requirements, may not require a RIS and therefore the impact of the requirement may not be comprehensively assessed or understood.

Impact statements are crucial and government departments should consider, and assess, the impact of these requirements before implementation. The inclusion of an impact statement, and utilisation of these to consider the cumulative impact of the

requirements on schools, would help to ensure that the burden (or impact) of requirements is better understood and potentially reduced.

Action two – Establishment of a national Policy and Advisory Library

The establishment of a national Policy and Advisory Library that brings together all sources of Commonwealth policy for schools. This would provide a central source of consistent compliance related assistance and advice and an opportunity to review, cleanse and/or standardise policies (similar policies) and develop templates to reduce the burden.

Legislation applies across all three sectors and there is a lack of understanding about some legal, regulatory and compliance obligations. A national Policy and Advisory Library with all Commonwealth policy for schools that exists in multiple locations, into a single location, where staff can easily access policy, guidance and supporting resources would assist to reduce the burden of Commonwealth policy on systems and schools.

A national Policy and Advisory Library will benefit different audiences across jurisdictions, and this will be dependent on how each jurisdiction's school system engages with the Commonwealth. The Policy and Advisory Library could however also assist systems with regard to Commonwealth policy and advice which would indirectly assist schools.

The inclusion of simple and easily accessible information about the intent of the requirements such as the why (in terms of the benefits for students, teachers and school leaders) would also provide a clearer line of sight to the purpose of the administrative or compliance requirement.

The identified better practice approach of ensuring the provision of better practice compliance related assistance and advice, including initial training and ongoing support in a variety of modes and communication which outlines that guidance is just guidance, is also applicable to Commonwealth compliance and administrative requirements.

Action three – Opportunity to streamline or trial alternative approaches in key areas
Streamlining disability data reporting with the NCCD data reporting

Greater alignment between the data collection requirements of the Australian Government Department of Education, Skills and Employment (DESE) and the jurisdictions. Various jurisdictions collect data on students with disability and the data may be similar to or overlap with the NCCD collected by the department. Greater alignment would reduce areas of overlap between data collection requirements and thereby reduce the burden of multiple reporting of the same or similar information and data.

This could be further explored through the department's regulatory harmonisation work and the implementation of the National School Resourcing Board's (the Board) review of the loading for students with disability report. This work should also consider the Board's review recommendation to refine the design and delivery of the post enumeration process for assurance of the NCCD to ensure it is consistent and responsive to school context.

Greater flexibility and coordination in relation to the timing and up loading of NCCD data

Simplifying data collection, reporting and assurance processes and greater alignment between the data collection requirements of DESE and the jurisdictions. The NCCD Guidelines prescribe a window of a week for approved authorities to upload NCCD data as part of both the government (October) and non-government census (August). Some jurisdictions conduct their school census at the same time, which puts pressure on school staff.

Greater coordination and alignment between the data collection requirements would reduce the burden created when data collection and reporting occur at the same time. This could also be further explored through the department's regulatory harmonisation work and the implementation of the Board's review of the loading for students with disability report.

Provision of education for overseas students

Streamlining the regulation of schools as international education providers will reduce the burden on schools and provide new opportunities for Australian education providers to expand their business to deliver training to overseas students. Legislation has recently been introduced to allow overseas students to undertake short/supplementary courses that are part of the Australian Qualification Framework (AQF). This included exempting some supplementary courses from registration on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) and removing

duplicative CRICOS registration requirements for vocational education and training (VET) units of study delivered as part of a school course.

This clarified that where a school offers a VET component, which is an integral part of the school's secondary school certificate, the VET component is to be included in the scope of the school provider's CRICOS registration for the school course. This change should streamline processes and increase flexibility for school providers who wish to deliver VET to overseas students by removing the duplicative regulatory burden of having to register the VET course with both the Australian Skills Quality Authority (ASQA) and DESE.

This should benefit both schools as they will not have to monitor the CRICOS registration of the VET providers they partner with, and overseas students through increased access to VET courses as part of their study in Australian schools. VET providers will have reduced or eliminated CRICOS obligations, reducing or removing fees, and regulatory requirements that are additional to their domestic requirements.

Copyright requirements

Simplify and update Australia's copyright laws to better support the needs of Australians and public institutions to access material in an increasingly digital environment. This includes allowing the use of material if the copyright owner cannot be found, introducing a fair dealing exception for non-commercial quotation, simplifying and updating copyright exceptions for educational and cultural institutions, and streamlining the government statutory licensing scheme. This will support the reasonable and necessary use of copyright materials online while also removing administrative burden. Improvements to the annual copyright survey should be considered to reduce the workload on teachers to collate the information required and attend training.

Action four – A toolkit that enables schools to develop a process to review and redesign their own practices

The development of a toolkit to support schools to develop a process to review and redesign their own practices in ways that diminish the time they devote to non-teaching and non-leading tasks. The toolkit would be developed through consultation with the profession to ensure it is practical, useful, fit for purpose i.e. applicable and adaptable to different jurisdictional and sectorial contexts.

The UK Department for Education's *Reducing School Workload Toolkit*, which supports schools to identify and address workload issues in their school and evaluate the impact of their workload reduction measures, could be adapted for the Australian context. This would enable schools to manage their own internal processes for identifying and streamlining school practices and in doing so free up time for teaching and learning.

The provision of a toolkit to enable schools to review and redesign their own practices in ways that diminish the time they devote to non-teaching and non-leading tasks would provide more time for teachers and school leaders to focus on those activities that have the greatest impact on student growth and achievement. Teachers earlier in their career find it especially hard to know what they can put aside as this comes with experience.

The toolkit would support and inform the development of a process to consider what to let go and reduce the time spend on non-teaching and non-leading tasks. This would assist schools to reduce the burden of compliance and administration that is associated with in-school practices.

Attachments

Attachment A: Reducing Red Tape for Teachers and School Leaders – Terms of Reference

It is important that teachers and school leaders spend as much of their time as possible on those activities that have greatest impact on student growth and achievement. The primary aim of the review will be to identify the ways in which schools and jurisdictions are reducing red tape for teachers and school leaders, with a view to sharing better practice approaches.

Red tape is a concern consistently raised by stakeholders. There have been many efforts over the years to reduce the impact on schools of red tape and duplication at the jurisdictional and national levels, and this review will be designed to learn from this past work.

The review will start from the premise that the requirements placed on schools exist for a reason, and that there are processes underway in many jurisdictions, systems and sectors and nationally to review and reduce regulatory burden.

The review, through consultation and research, will:

1. Identify (broadly) the Commonwealth and State and Territory compliance and administrative requirements that are experienced by schools.

2. Advise on the better practice used in jurisdictions and sectors to reduce red tape, taking into account local context on how these requirements are operationalised, including efforts to reduce compliance requirements, coordinate and streamline their impact in schools, and improve how schools meet these requirements to free up teacher and school leader time.

3. Highlight best practice approaches in jurisdictions, systems and sectors that have potential national application.

4. Recommend national actions.

Scope

'Red tape' refers to the compliance requirements faced by schools. For the purposes of this review, compliance requirements are defined as those activities that are required for schools, teachers and school leaders, and have the potential to take them away from the core business of teaching and learning. This does not imply that these activities are unnecessary or unimportant. Many are essential to maintain student safety, meet legislative requirements and community expectations.

However, a reduction in the compliance burden faced by teachers and school leaders would free them up to focus on increasing their impact on student outcomes. In this context, compliance does not include activities that contribute to school improvement, such as planning or implementation. It also does not include activities that contribute to improving the quality of teaching and school leadership, such as teacher registration, performance and development or professional learning.

The scope of the review will **include** consideration of:

- Existing and potential approaches being adopted by schools and jurisdictions to reduce red tape for teachers and school leaders, including improving the effectiveness and efficiency in how red tape is met.

The scope of the review should **exclude** consideration of:

- Whether particular compliance requirements are justified or necessary.

- Aspects of teacher and school leader time use that have implications for matters which are specified in industrial agreements.

- A process for implementing any recommendations from the review.

Governance Arrangements

The Australian Government Minister for Education has commissioned the Australian Institute for Teaching and School Leadership (AITSL) to conduct the review.

AITSL will be responsible for undertaking the review.

The conduct of the review will be overseen by the AITSL Board, which will approve any reports to Education Council.

State and Territory governments will be engaged as partners in the review, with reporting to the Schools Policy Group and the Australian Education Senior Officials Committee.

The terms of reference were endorsed by Education Council on 11 December 2019.

Consultation

In conducting the review, AITSL will undertake comprehensive consultation with key stakeholders in the education sector and the teaching profession.

AITSL will commence this consultation through meetings with the Australian Government, State and Territory Education Departments, the National Catholic Education Commission and the Independent Schools Council of Australia to understand jurisdictional and sectoral contexts before undertaking wider consultation.

Other stakeholders to be consulted will include, but not be limited to, teacher regulatory authorities, curriculum authorities, Principal associations, teacher unions, and teachers and school leaders. AITSL will liaise with relevant system authorities prior to engagement with teachers and school leaders and work with system authorities to minimise any administrative burden on schools to participate in this review.

Timeline

The review report will be presented to Education Council in September 2020. To achieve this, an issues paper will be developed, based on a review of the literature and current practice, and presented to Education Council for comment early in 2020. This will be followed by consultation, and preparation of the final report by September 2020.

Attachment B: AISSA Compliance Calendar – Sample

Date	Description
Ongoing	Update details of changes to key personnel on SchoolsHUB
Ongoing	Ensure details are accurate on Child Care Management System (CCMS)
Ongoing	Update details of changes to key personnel to the Department for Education
At least twice per year	Provide a student report that meets the requirements under the Australian Education Act 2013
January	First DESE advance Commonwealth SRS payment (50 per cent advance)
January/February	Reference period* commences for the collection of Student Attendance Data (DESE) *Reference Period: 'the first school day of the year through to and including last school day of Semester 1, or until the Friday on or before 30 June if there is no break in June/July.'
28 January	Quarterly Superannuation Payment due. *Note: Some super funds, contracts and agreements that provide for salary sacrificing require superannuation to be paid more regularly (for example, monthly) than the SG quarterly requirement.*
February	Teachers Registration Board Census
February	Request for TPS Levy Information / Income Declaration sent to providers (CRICOS Registered Schools) *Note: Date to be released.*
4 February	BGA Round 2021 Stage 2 Capital Grant applications – closing date
10 February	NAPLAN Data Collection – Registration of students in Years 3, 5, 7 and 9 for 2020 NAPLAN and Student Background Data
12 February	BGA Master Plan grant applications for February review – closing date
14 – 28 February	Term 1 Department for Education Preschool Data Collection (reference period 3 – 14 February)
21 February	National School Chaplaincy Programme – final date for return of certification form
25 February	AISSA Membership Fees due
28 February	CRICOS Annual Registration Charge invoice payment due (CRICOS Registered Schools)
March	Tuition Fee Income for 2018 to be entered into PRISMS (CRICOS Registered Schools) *Note: Date to be advised*
6 March	Term 1 School Card Data Collection Date *Note: For schools continuing to use the School Card process*
13 March	2020 Student Residential Address Collection (to support the development and implementation of the direct measure of capacity to contribute for non-government schools) closing date
29 March	Animal Ethics - closing date for submission of Application for Categories 4 and 5 Activities or Non-Listed Activities
April	TPS Levy invoices sent via PRISMS *Note: Date to be advised*
3 April	Term 1 School Card Data Collection Date *Note: For schools continuing to use the School Card process*

References

Audit Office of New South Wales (2016) *Red tape reduction*, Department of Premier and Cabinet / Department of Finance, Services and Innovation, Australian Government, accessed 30 September 2020.
https://www.audit.nsw.gov.au/sites/default/files/pdf-downloads/2016_Aug_Report_Red_Tape_Reduction.pdf

ACCI (Australian Chamber of Commerce and Industry) (2015) *ACCI 2015 National red tape survey*, ACCI, accessed 30 September 2020.
https://www.australianchamber.com.au/wp-content/uploads/2018/01/National-Red-Tape-Survey-March-2015.pdf

Centre for Education Statistics and Evaluation (2018) *Local Schools, Local Decisions evaluation interim report*, Department of Education, New South Wales Government, accessed 30 September 2020.
https://www.cese.nsw.gov.au/publications-filter/local-schools-local-decisions-lsld-evaluation

Caldwell B (8 January 2000) '*Scenarios for leadership and abandonment in the transformation of schools*' [conference presentation], 13th Annual International Congress for School Improvement, Hong Kong, accessed 30 September 2020.
https://files.eric.ed.gov/fulltext/ED440463.pdf

Caldwell B (2000) 'The transformation of schools: Scenarios for leadership and "abandonment"' [unpublished conference presentation], Occasional Paper No. 92, IARTV (now Centre for Strategic Education).

Commonwealth of Australia (2014a) *The Australian Government guide to regulation*, Department of the Prime Minister and Cabinet, Australian Government, accessed 30 September 2020.
https://www.pmc.gov.au/sites/default/files/publications/Australian_Government_Guide_to_Regulation.pdf

Commonwealth of Australia (2014b) *Regulator performance framework*, Department of the Prime Minister and Cabinet, Australian Government, accessed 30 September 2020.
https://www.pmc.gov.au/resource-centre/regulation/regulator-performance-framework

Commonwealth of Australia (2016) *User guide to the Australian Government guide to regulation*, Office of Best Practice Regulation, Department of the Prime Minister and Cabinet, Australian Government, accessed 30 September 2020.
https://www.pmc.gov.au/sites/default/files/publications/001-User-Guide-aus-gov.pdf

Council of Australian Governments (COAG) (2007) *Best practice regulation: A guide for Ministerial Councils and national standard setting bodies*, COAG, accessed 30 September 2020.

https://www.pmc.gov.au/resource-centre/regulation/best-practice-regulation-guide-ministerial-councils-and-national-standard-setting-bodies

Deloitte (2017) *Principal workload and time use study*, report to the NSW Department of Education, Deloitte.
https://education.nsw.gov.au/content/dam/main-education/gef/media/documents/Principal-workload-and-time-use-study-Nov-2017.pdf

Department for Education (DfE) (2018b) *School workload reduction toolkit*, DfE, United Kingdom Government, accessed 30 September 2020.
https://www.gov.uk/guidance/school-workload-reduction-toolkit

Department of Education (2017) *School Leadership Strategy*, Department of Education website, New South Wales Government, accessed 30 September 2020.
https://cms.det.nsw.edu.au/media/schools-operation/School-Leadership-Strategy-2017.pdf

Department of Education (2018) *Evaluation of the Independent Public Schools Initiative: Report 2018*, Department of Education, Queensland Government, accessed 30 September 2020.
https://education.qld.gov.au/schools-and-educators/Documents/ips-evaluation-report.pdf

Department of Education and Communities (2013) *Local Schools, Local Decisions: The reform agenda*, Department of Education and Communities, New South Wales Government, accessed 30 September 2020.
http://currentreforms.weebly.com/uploads/2/6/9/9/26999857/lsld_reform_overview.pdf

Department of Education and Training (DET) (2019) *Operational policy reform Principal survey*, DET, Victoria State Government.

Department of the Prime Minister and Cabinet (2019) *Our public service, our future: Independent review of the Australian public service* (the Thodey Report), Australian Government, accessed 30 September 2020.
https://pmc.gov.au/sites/default/files/publications/independent-review-aps_0.pdf

Department of Treasury (2016) *NSW Government Guide to Better Regulation. Policy and guidelines paper: TPP 19-01*, Department of Treasury, New South Wales Government, accessed 30 September 2020.
https://www.treasury.nsw.gov.au/sites/default/files/2019-01/TPP19-01%20-%20Guide%20to%20Better%20Regulation.pdf

Department of Treasury (2020a) *Types of burden: What types of red tape does Government produce?* Department of Treasury, Government of Western Australia, accessed 30 September 2020.
https://www.wa.gov.au/sites/default/files/2020-02/Red-Tape-Types-of-burden.pdf

Department of Treasury (2020b) *Rapid assessment tool*, Department of Treasury website, Government of Western Australia, accessed 30 September 2020.
https://www.wa.gov.au/sites/default/files/2020-02/Red-Tape-Rapid-Assessment-Tool.pdf

Department of Treasury and Finance (2018) *Statement of expectations framework for regulators*, Department of Treasury and Finance, Victoria State Government, accessed 30 September 2020.
https://www.dtf.vic.gov.au/reducing-regulatory-burden/statement-expectations-regulators

Easton S (6 November 2014) 'Redefining regulators: cutting red tape and risk management', *The Mandarin*, accessed 30 September 2020.
https://www.themandarin.com.au/9089-redefining-regulators-red-tape-risk-management/

Education Central (13 December 2017) 'The death of National Standards', *Education Central* New Zealand, accessed 30 September 2020.
https://educationcentral.co.nz/the-death-of-national-standards/

Education Central (7 November 2018) 'Minister moves to cut red tape in schools', *Education Central* New Zealand, accessed 30 September 2020.
https://educationcentral.co.nz/minister-moves-to-cut-red-tape-in-schools/

Government of Canada (2018) *Cabinet directive on regulatory management*, Government of Canada webpage, accessed 30 September 2020.
https://www.canada.ca/en/treasury-board-secretariat/services/federal-regulatory-management/guidelines-tools/cabinet-directive-regulatory-management.html

Government of Western Australia (n.d.) *Better regulation unit fact sheets*, Government of Western Australia.

Government of Western Australia (2017) *Working together: One public sector delivering for WA. Service priority review – Final report to the Western Australian Government*, Government of Western Australia, accessed 30 September 2020.
https://www.wa.gov.au/sites/default/files/2019-07/Service%20Priority%20Review%20-%20Final%20Report.pdf

Government of Western Australia (2018) *Red tape reduction: How can I reduce red tape?* Government of Western Australia.

GOV.UK (2015) *Workload challenge: Analysis of teacher consultation responses, Research report*, Department for Education, GOV.UK, accessed 30 September 2020.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/401406/RR445_-_Workload_Challenge_-_Analysis_of_teacher_consultation_responses_FINAL.pdf

GOV.UK (2018a) *Making data work: Report of the Teacher Workload Advisory Group*, Department for Education, GOV.UK, accessed 30 September 2020.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/754349/Workload_Advisory_Group-report.pdf

Greiner N, McCluskey S and Stewart-Weeks M (2017) *NSW Regulatory Policy Framework Independent Review – Final Report*, Regulatory Policy Framework Review Panel, accessed 30 September 2020.
https://www.treasury.nsw.gov.au/sites/default/files/2018-02/Independent%20Review%20of%20the%20NSW%20Regulatory%20Policy%20Framework%20final%20report.pdf

Heffernan A, Longmuir F, Bright D and Kim M (2019) *Perceptions of teachers and teaching in Australia*, Monash University, accessed 30 September 2020.
https://research.monash.edu/en/publications/perceptions-of-teachers-and-teaching-in-australia

Heffernan A and Pierpoint A (2020) *Autonomy, accountability, and Principals' work: An Australian study, Final report*, Australian Secondary Principals' Association (ASPA), accessed 30 September 2020.
https://app.education.nsw.gov.au/serap/Download/DownloadResearchAsset?id=218

House of Representatives Standing Committee on Employment, Education and Training (5 April 2019) *Status of Teaching inquiry – Inquiry into the status of the teaching profession* [media release], Parliament of Australia, accessed 30 September 2020.
https://www.aph.gov.au/Parliamentary_Business/Committees/House/Employment_Education_and_Training/TeachingProfession/Media_Releases

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Lane A (2018a) 'Over-regulation in public services', in Allen D and Berg C (eds) *Australia's red tape crisis: the causes and costs of over-regulation*, Connor Court, Cleveland, Queensland.

Lane A (2018b) 'Regulatory constraints on public sector innovation: A case study on Queensland's Independent Public School Program', *Australian Journal of Public Administration*, 77(4):685-699, doi:10.1111/1467-8500.12307

Lindquist E (2010) 'From rhetoric to blueprint: The Moran Review as a concerted, comprehensive and emergent strategy for public service reform', *Australian Journal of Public Administration*, 69(2):115-151, doi:10.1111/j.1467-8500.2010.00684.x

Macklin P and Zbar V (2017) *Driving school improvement: A practical guide*, Australian Council for Educational Research (ACER), Melbourne.

OECD (Organisation for Economic Cooperation and Development) (2020) *TALIS 2018 results (Volume II): Teachers and school leaders as valued professionals,* OECD, accessed 30 September 2020.
http://www.oecd.org/education/talis-2018-results-volume-ii-19cf08df-en.htm

Office of the Coordinator-General (2018) *Tasmanian red tape audit report 2018–19*, Tasmanian Government, accessed 30 September 2020.
https://www.cg.tas.gov.au/__data/assets/pdf_file/0018/221841/Tasmanian_Red_Tape_Audit_Report_2019.pdf

Parliament of Australia House of Representatives Standing Committee on Employment, Education and Training (2019) *Status of the teaching profession inquiry*, Parliament of Australia, accessed 30 September 2020.
https://www.aph.gov.au/Parliamentary_Business/Committees/House/Employment_Education_and_Training/TeachingProfession

Queensland Treasury (2019) *The Queensland Government guide to better regulation*, Queensland Treasury, Queensland Government, accessed 30 September 2020.
https://s3.treasury.qld.gov.au/files/guide-to-better-regulation.pdf

Riley P (2019) *The Australian Principal Occupational Health, Safety and Wellbeing Survey: 2018 Data*, Australian Catholic University, Fitzroy, Victoria.
https://www.principalhealth.org/au/2018_AU_Final_Report.pdf

Shergold P (2018) *Reducing red tape in the APS*, Australian Public Service Commission, Australian Government, accessed 30 September 2020.
https://www.apsc.gov.au/reducing-red-tape-aps

The Association of Independent Schools of NSW (AISNSW) (2020) *NSW School Compliance Calendar*, AISNSW website, accessed 30 September 2020.
https://www.aisnsw.edu.au/school-leaders/policy-and-compliance

The Association of Independent Schools of Western Australia (AISWA) (2020) *School Compliance Calendar*, AISWA website.

Tillett A (24 June 2019) 'Morrison to cut red tape, reform IR', *Financial Review*, accessed 30 September 2020.
https://www.afr.com/politics/federal/morrison-to-cut-red-tape-reform-ir-20190623-p520i5

Victorian Auditor-General (2016) *Reducing the burden of red tape: Victorian Auditor-General's Report (2015-16:32)*, Victorian Auditor-General's Office, Victoria State Government, accessed

30 September 2020.
https://www.audit.vic.gov.au/sites/default/files/20160525-Red-Tape.pdf

Wild D and Allen D (2018) *Five principles of red tape reduction*, Institute of Public Affairs (IPA), accessed 30 September 2020.
https://ipa.org.au/wp-content/uploads/2018/06/IPA-Report-Principles-of-Red-Tape-Reduction.pdf