

Department of Education

Response to issues raised in submissions received on the Education (General Provisions) Amendment Bill 2025

The enclosed information from the Department of Education responds to issues raised in the published public submissions numbered from 1 to 34 on the Education (General Provisions) Amendment Bill 2025.

Part A provides a response from the Department of Education to issues raised in the public submissions.

Part B provides a summary of the out-of-scope matters raised by stakeholders in the public submissions, which have not been responded to by the Department of Education, as they are not relevant to the Education (General Provisions) Amendment Bill 2025.

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PART A – Matters within scope of the Education (General Provisions) Amendment Bill 2025

Issues raised in submissions	Summary of issues raised in submission and departmental responses to issues raised
Approved Online Services	
<p>Eight submissions addressed this reform:</p> <ul style="list-style-type: none"> • Office of the Information Commissioner (No. 13) • Queensland Family and Child Commission (No. 15) • PeakCare (No. 18) • Queensland Catholic Education Commission (No. 20) • Queensland Secondary Principals' Association (No. 22) • Queensland Teachers' Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (No. 25) • Isolated Children Parents' Association Inc. (No. 32) • Queensland Law Society (No. 34) 	<p>Three submissions support the reform, with five submissions supporting the reform while setting out additional considerations.</p> <p>Submissions 15, 22 and 32 support the proposed reforms.</p> <p>Submissions 13, 18, 20, 25 and 34 support the proposed reforms, while setting out additional requirements.</p> <p>The Office of the Information Commissioner (OIC) (No. 13) supports the safeguards inserted in the Bill for approved online services and recommends a Privacy Impact Assessment be conducted to assist in identifying any privacy risks and formulating appropriate mitigation strategies and publishing the PIA to the greatest extent practicable. Additionally, the OIC submission provided considerations about implementation.</p> <p>PeakCare (No. 18) supports the streamlining of student access to online services. PeakCare recommends that the Bill incorporate appropriate and rigorous protections to ensure security of student data, and that the use and success of these protections are included in the Department of Education's annual report, including any data breaches and management of those breaches.</p> <p>The Queensland Catholic Education Commission (QCEC) (No. 20) supports the approved online service reforms (which apply only to state schools) and requests non-state schools also be allowed to approach the use of online services the same way, with a delegated authority approach.</p> <p>The Queensland Teachers' Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (QTU/IEU) (No. 25) broadly supports the proposed legislative safeguards proposed in the Bill and recommends that the Committee support the proposed amendments for approved online services. The QTU/IEU submission also provided considerations about implementation.</p> <p>The Queensland Law Society (QLS) (No. 34) notes that, generally, the proposal for a centralised approval process for online services utilised by Queensland state schools is a positive step towards improved privacy protection of children engaging with education technology, but does not support removal of the requirement for students and/or their parents/caregivers to consent to the disclosure of their personal information for the purpose of using an online service approved by the Chief Executive (Department of Education). The QLS recommends that the requirement for consent be maintained (i.e. opt-in model, rather than opt-out) and parent/students be given information to inform their decision to consent. The QLS also notes that:</p> <ul style="list-style-type: none"> • the Bill does not address student intellectual property rights which may be particularly important to older students (including artistic works or even coding); and • the Bill does not appear to grant the Chief Executive power to enter these end user terms on behalf of students. The authority to do so in most cases will continue to remain the responsibility of parents and carers. This means approval of terms of use will need to be managed at the local level by schools. The submitter's preferred approach is that consent of parents/students is required for both privacy and terms of use. <p>The QLS also recommends that further consideration of the financial impacts of this reform is required to ensure online service approval processes, auditing and maintenance of public facing lists are managed appropriately.</p> <p>Response:</p> <p>The Department of Education notes the support for these amendments.</p> <p>Privacy</p> <p>Assessment of the privacy impacts of the proposal for approved online services, and ways in which the department's obligations under the <i>Information Privacy Act 2009</i> (IP Act) can be met, were key considerations of the Department of Education during development of the proposal. This is evident in the requirement that for a service to be an approved online service, the chief executive must be satisfied that a contract or other arrangement entered into with the entity that provides the online service is a service arrangement (under section 34 of the IP Act) and the entity is a bound contracted service provider (defined in schedule 5 of the IP Act) in relation to the contract or arrangement. The requirement for a service arrangement with the entity providing the online service and that the entity is a bound contracted service provider requires key obligations set out in the IP Act to be met by the agency and the entity providing the service.</p> <p>The Bill supports privacy considerations by requiring the chief executive to:</p> <ul style="list-style-type: none"> • be satisfied that an appropriately qualified employee of the Department of Education has assessed each online service according to a nationally endorsed framework, <i>Safer Technology 4 Schools (ST4S)</i> which considers if: <ul style="list-style-type: none"> – the online service is suitable to protect the privacy and online security of relevant information about the student that may be disclosed to, or recorded or used by, the entity providing the service; and

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	<p>– the entity that provides, or is to provide, the online service does not, for the purpose of providing the service, require the disclosure to, or recording or use by, the entity of sensitive information about the student.</p> <p><i>Proposed process for assessment of Approved Online Services</i></p> <p>The framework that will be used for this assessment is the <i>ST4S</i> framework, which is a nationally endorsed approach used to evaluate digital products and services in schools across Australia and New Zealand, against a nationally consistent security and privacy control framework.</p> <p>This framework was developed with ‘privacy by design’ and ‘safety by design’ principles with further considerations around: information collected, the purpose for its collection, where the information will be stored, student intellectual property rights, how long information will be stored for, among others. The assessment framework is updated regularly to account for emerging technologies (such as artificial intelligence and machine learning) and evolving privacy and security risks.</p> <p>The QLS (No. 34) submits that consent should remain a prerequisite as an ‘opt-in’ model rather than an ‘opt-out’ model. As the purpose of the amendments is to support efficient consent management for use of third-party services, where individual state schools are using hundreds of online services, the current <i>Education (General Provisions) Act 2006</i> does not adequately provide a practical process to support state schools’ increased use of online services. These amendments provide a more practical approach for the use of approved online services, while ensuring appropriate information security and privacy safeguards are in place.</p> <p>Parents or carers will continue to be encouraged to review the terms, conditions and privacy policies of each online service used within their child’s school and are provided the ability to opt-out. Parental or student consent is still required by schools for the disclosure of student personal information to an online service that requires collection of sensitive information or that is not an approved online service.</p> <p>‘Sensitive’ personal information is defined in Schedule 5 of the <i>Information Privacy Act 2009</i> as amended by the <i>Information Privacy and Other Legislation Amendment Act 2023</i> (IPOLA), due to come into effect on 1 July 2025 for State Government departments, and includes health information, biometric information, religious beliefs and sexual orientation.</p> <p>To ensure transparency to parents and students, the Bill also requires the chief executive to ensure a list of all approved online services is made publicly available. The responsibilities and processes to obtain and manage student and individual consent for the use of online services is outlined in the department’s <i>Obtaining and managing student and individual consent procedure</i>.</p> <p>The Department of Education develops, maintains, and makes available a body of information, training and resources for schools and departmental staff regarding the department’s privacy obligations, privacy principles and the management of privacy breaches and complaints. Appropriate resources are currently being drafted to ensure the department’s requirements under the Mandatory Notification of Data Breaches (MNDB) Scheme, also currently scheduled for introduction from 1 July 2025 for the department, are met.</p>
Home Education age eligibility	
<p>23 submissions* addressed this reform:</p> <ul style="list-style-type: none"> • Parents of home education registered children (No. 1 to 12, 14, 16, 17, 27, 31, 33) • Queensland Family and Child Commission (No. 15) • Down Syndrome Queensland (No. 19) • Home Education Association Qld (No. 23) • Free2HomeSchool (No. 24) • Queensland Teachers’ Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (No. 25) • Home Education Expert Group members (No. 31) <p><i>* Note: some individual recipients also submitted as a representative of an organisation</i></p>	<p>All submissions support the reform.</p> <p>Submissions 1 to 12, 14 to 19, 23, 24, 27, 31 and 33 support the extension of age eligibility for home education registration by 12 months, as provided in the Bill.</p> <p>Submissions 2, 12, 14, 23, 24, 27 and 31 also seek a further extension of the registration period. These submissions propose variously that:</p> <ul style="list-style-type: none"> • the Bill allow for an extra 12 months (two semesters) of registration for students who have had a delayed start to education or repeated a year of schooling to enable completion of their home education, as is provided in schools on application; • age eligibility be increased universally by an additional 12 months (to 19 years), <u>or</u> worded such that only students who would benefit from accessing an additional year of registration be able to access the additional time period (such as students with disability, learning difficulties, neurodivergence, and/or physical or mental health issues); • aspects of New South Wales’ (NSW) home education registration approach to allow for extra time in home education be adopted. <p>The QTU/IEU (No. 25) recommends that the Committee support the proposed amendments for home schooling, noting that home schooling should not be endorsed as a long-term solution to the complex challenge of resourcing the education system to provide positive and engaging learning experiences for a diverse range of students.</p> <p>Response:</p> <p>The Department of Education notes the support for this reform.</p>

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	<p>The Bill amends the <i>Education (General Provisions) Act 2006</i> (EGPA) to align the age of eligibility for home education registration with students attending a state or non-state school; that is, eligibility for registration extends to 31 December in the year the young person turns 18 years. This change will enable students to continue to receive benefits related to their registered status at ages equivalent to students in state and non-state schools.</p> <p>In relation to further extending the age of eligibility for registration beyond 18, some submitters made a comparison with student entitlements in State schooling. The EGPA provides for an allocation of 26 semesters of State education. The concept of 'allocation of semesters' is not applicable to home education registration noting 'basic allocation' as defined under section 11(1) of the EGPA limits this to State education. Allocation of semesters does not apply to non-state education either. Decision points apply to any semester of allocation beyond 26 semesters – these are not universally applied. Two extra semesters may be granted by principals beyond the 26 semesters if the student has no remaining allocation (EGPA Chapter 4, Part 3). A further four extra semesters may be granted by the chief executive if there is no remaining allocation, and after extra two semesters (EGPA Chapter 4, Part 5). In deciding applications for further semesters, the EGPA sets out that the principal (EGPA Chapter 4, Part 3, section 66(1)) and the chief executive (EGPA Chapter 4, Part 5, section 72(1)) consider all relevant matters including, for example:</p> <ul style="list-style-type: none"> • whether the student is of compulsory school age; and • the likely <i>educational</i> outcome of the student attending the stated State school for the further semester or semesters; and • the likely <i>impact</i> on the resources of the (stated) State school of the student attending the (stated) State school for the extra semester or semesters. <p>In relation to the comparison drawn with New South Wales (NSW);</p> <ul style="list-style-type: none"> • The <i>Education Act 1990 (NSW)</i> does not prescribe age eligibility for home education, but does prescribe that home education registration is limited to a period not exceeding two years. A parent must make new applications for registration every two years if home education is to be continued (compared to Queensland, where registration continues as long as the requirements of registration are met). • The NSW Education Standards Authority (NESA) guidelines require that: <ul style="list-style-type: none"> – the parent must use a NESA syllabus for home education: 'the child's educational program is based on and taught in accordance with the relevant NESA syllabuses as determined by the <i>Education Act 1990 (NSW)</i>, that is, the minimum curriculum for primary education (Kindergarten to Year 6), the minimum curriculum for secondary education (Years 7 to 10) or the curriculum for senior secondary education (Years 11 and 12) (Note: Sections 7 to 10 of the Guidelines provide details of the required curriculum.); and – age eligibility is set out as 'children that will turn five years of age on or before 1 July (in the year they are registered) and may continue up to the age of 18 and for a continued period, up to two years, in order to complete the planned educational program based on NESA's syllabuses'. <p>This means completion of a program based on NESA's syllabus is the only reason registration can continue after 18 years, for an additional period up to two years.</p> <p>By comparison, in Queensland parents are not required to base their home education program on the Australian Curriculum or any particular syllabus.</p> <p>There is therefore no equivalent basis to continue registration for any period beyond 18 years in order to complete a regulated educational program or qualification.</p>
Enabling principals to delegate the telling of suspension decisions	
<p>Four submissions addressed this reform:</p> <ul style="list-style-type: none"> • Office of the Aboriginal and Torres Strait Islander Children's Commission (No. 21) • Queensland Secondary Principals' Association (No. 22) • Queensland Teachers' Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (No. 25) • Queensland Advocacy for Inclusion (No. 30) 	<p>All submissions support the proposed reform.</p> <p>The Office of the Aboriginal and Torres Strait Islander Children's Commission (No. 21) supports the proposal but noted that the Bill does not include broader reforms for the school disciplinary absence (SDA) process. This submission provided additional information outside the scope of the Bill, which is set out in Part B of this response.</p> <p>The QTU/IEU (No. 25) welcome the proposed amendments that allow a principal to delegate the authority of notifying a student about a student disciplinary absence decision, noting their consistent support for the proposal, and recommends the Committee support the proposed amendments.</p> <p>Queensland Advocacy for Inclusion (No. 30) while supporting the proposal, also noted that this reform should be accompanied by other amendments that seek to improve the quality of suspension decisions and enhance the accountability of suspension decisions. These matters are outside the scope of the Bill and are set out in Part B of this response.</p> <p>Response</p> <p>The Department of Education notes the support for the proposed amendment.</p> <p>The Bill does not provide any legislative mechanism that would allow any person other than a principal to make such decisions.</p>

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	Enabling other members of staff to convey decisions to students and their families will support communication about the reasons for the decision. Further, the ability to delegate the telling of a suspension decision does not mean that a principal must use it in every case. Where a principal wishes to be the person communicating the decision and reasons, they will still be able to do so.
Special school enrolment transfers	
<p>Three submissions addressed this reform:</p> <ul style="list-style-type: none"> Queensland Family and Child Commission (No. 15) Queensland Teachers' Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (No. 25) Isolated Children's Parents' Association Inc. (No. 32) 	<p>All submissions support the proposed reform.</p> <p>The Queensland Family and Child Commission (QFCC) (No. 15), the QTU/IEU (No. 25) and ICPA Inc. (No. 32) all noted the proposed reforms will simplify the process for transfer of enrolment, reducing administrative delays and helping to ensure that students with disabilities experience smoother transitions to schools that can meet their specific educational needs.</p> <p>Response:</p> <p>The Department of Education notes the support for these amendments.</p>
Parents and Citizens Associations (P&C) to provide for multiple campuses, donations between P&Cs and the management of P&C executive membership	
<p>Five submissions addressed these reforms:</p> <ul style="list-style-type: none"> PeakCare (No. 18) Queensland Secondary Principals' Association (No. 22) Queensland Teachers' Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (No. 25) P&Cs Queensland (No. 26) Isolated Children's Parents' Association Inc. (No. 32) 	<p>Submissions support the proposed reforms.</p> <p>P&Cs Queensland (No. 26) supports the proposed reforms in full.</p> <p>The QTU/IEU (No. 25), while supporting proposed reforms about donations and management of executive membership, considers that the proposed reforms for multiple campus schools would impact current provisions applicable to school councils as set out under the EGPA and that duplication or replication of the functions of a school council by campus associations undermines the authority of the school council and will result in additional work, accountability and responsibility for school leadership.</p> <p>PeakCare (No. 18) supports the proposed amendments. PeakCare notes that the Bill be amended to require the Department of Education to support P&Cs to pay for Criminal History Checks on persons applying to membership of executive committees.</p> <p>Response:</p> <p>The Department of Education notes the support for these amendments.</p> <p>The drafting in clauses 16 to 24 identified by the QTU/IEU does not expand the role of school councils and does not duplicate or replicate the functions of a school council by campus associations. These clauses are consequential amendments to enable a regional school to have multiple campuses. They retain the status quo but incorporate the new concept of a campus P&C, in the same way that existing P&Cs operate in relation to school councils.</p> <p>The Bill deliberately does not impose a legislative requirement for P&Cs or individuals to undertake criminal history checks. Requiring this legislatively would impose a regulatory burden on P&Cs and individuals. Instead, the management of this defers to local management by P&Cs as best suits their individual circumstances, and to individuals abiding by requirements. On balance, this was considered to give the best outcome to improving integrity, while limiting impacts on P&Cs and members.</p>
Collection of information from non-state school principals or governing bodies	
<p>One submission addressed this reform:</p> <ul style="list-style-type: none"> Queensland Catholic Education Commission (No. 20) 	<p>The QCEC (No. 20) supports the reform, noting that the amendments will clarify the provision of information to the chief executive by non-state schools.</p> <p>Response:</p> <p>The Department of Education notes the support for these amendments.</p>
Improving eKindy accessibility	
<p>Four submissions addressed this reform:</p> <ul style="list-style-type: none"> Queensland Family and Child Commission (No. 15) PeakCare (No. 18) Down Syndrome Qld (No. 19) 	<p>All submissions support the reform with one submission supporting the amendments in-principle.</p> <p>The QFCC (No. 15) notes the importance of high-quality early childhood education in laying a strong foundation for children's social, cognitive and emotional development. The submission notes the proposed reforms will further support these early learning opportunities and streamline pathways into education for vulnerable children, ultimately contributing to improved educational outcomes.</p> <p>PeakCare (No. 18) welcomes the commitment to improving access to early childhood education, particularly for children who might otherwise face barriers due to distance or health related absences. This submission also notes matters outside the scope of the Bill and these are set out in Part B of this response.</p>

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<ul style="list-style-type: none"> Queensland Teachers' Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (No. 25) 	<p>Down Syndrome Qld (No. 19) supports the promotion of access to quality kindergarten programs. The submission further notes issues that are outside the scope of the Bill, and these are set out in Part B of this response.</p> <p>Response:</p> <p>The Department of Education notes the support for these amendments.</p>
Protecting students and school communities – transfer notes	
<p>Seven submissions addressed this reform:</p> <ul style="list-style-type: none"> Queensland Family and Child Commission (No. 15) PeakCare (No. 18) Queensland Catholic Education Commission (No. 20) Queensland Secondary Principals' Association (No. 22) Queensland Independent Schools Parents Network (No. 28) Queensland Teachers' Union of Employees/Independent Education Union of Australia (Qld/NT Branch) (No. 25) Isolated Children's Parents' Association Inc. (No. 32) 	<p>All submissions support the proposed reforms.</p> <p>Submissions made by QFCC (No. 15), PeakCare (No. 18), QCEC (No. 20), QSPA (No. 22) and ICPA Inc. (No 32) consider that the mandatory use of transfer notes is important to support student and school community safety and wellbeing, and support continuity of education. These submissions also note that the timely sharing of appropriate information allows for schools to be better positioned to support students.</p> <p>Queensland Independent Schools Parents Network (No. 28) supports the reform but seeks assurance of a secure mode for data sharing and raises concern about financial and workload burden for independent schools associated with implementation, particularly for large intake year levels (Years 5 and 7). This submission also seeks financial support for independent schools to implement the mandatory transfer note framework and consultation with the non-state schooling sector in the communication of the reform and guidance material.</p> <p>The QTU/IEU (No. 25) submission supports the proposed reforms, noting that state and non-state school sectors should work together to determine a consistent approach. The QTU/IEU consider the 90-day period to be long and while noting the workload implications of a shorter timeframe, consider the need for information to be important. The QTU/IEU also suggest that the process for transfer notes should be automated and refer to national initiatives for the Unique Student Identifier.</p> <p>Response:</p> <p>The Department of Education notes the support for these amendments.</p> <p>The Department of Education is committed to working with stakeholders across both the state and non-state sectors to implement these reforms.</p> <p>The 90-day period (which is up to approximately a school term) post transfer to the new school will provide time for the principal to welcome and settle the student into their school and make their own assessment of the student. Setting the timeframe at 90 days rather than 90 school days ensures that if the timeframe coincides with one or more holiday periods that the timeframe is not extended by those holiday periods. However, it is also open to a principal to request a transfer note earlier in the 90-day period and to expect a response within 10 days.</p> <p>While it is acknowledged that requiring proactive information sharing via transfer notes may increase administrative processes for schools, this is balanced by the critical outcome of strengthening protections for students and school communities, consistent with the Disability Royal Commission recommendations, and supporting continuity of education.</p> <p>The Department of Education will provide guidelines to support principals to implement the changes, including determining the proportionate information that should be included in a transfer note, when they should be requested and how information should be managed. This will be developed in consultation with principal associations from both the state and non-state school sectors.</p> <p>The Department of Education will also consider leveraging systems and processes for secure and efficient information sharing arising from the ongoing national work to support information sharing for interstate student transfers and Unique Student Identifier.</p> <p>The amendments are proposed to commence by Proclamation and will take effect in 2026. The precise commencement will be established through consultation with the state and non-state school sectors. Considerations for commencement will take into account periods of the year where schools are under increased workload, such as at the start of Term 1.</p>

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PART B – Matters out of scope of the Education (General Provisions) Amendment Bill 2025

The following issues were raised in submissions but are not within the scope of matters considered within the Education (General Provisions) Amendment Bill 2025.

Issues raised in submissions	Scope of issue
eKindy	<p>PeakCare (No. 18) supports the proposed reforms for eKindy and notes the need to invest in increased support for teachers and students in pre and primary schooling years will help reduce school suspension and exclusion rates, particularly for children with disabilities, First Nations children and children in care.</p> <p>Down Syndrome Queensland (No. 19) commends the stated objective to promote access to quality kindergarten programs and supports the changes for medical eligibility. The submission also raises the need for exclusive access for students with Down Syndrome and intellectual disabilities in remote and rural settings. The submission also seeks the Government to:</p> <ul style="list-style-type: none"> provide dedicated resources and support tailored to the home-schooling community of students with intellectual disabilities; and funding to collaborate with disability peak organisations, such as Down Syndrome Queensland, who have the expertise to assist the Queensland Government's home-schooling unit with providing essential adjustments and support for students with disability. fund and enable inclusive access to services offered by Down Syndrome Queensland for educators of students with intellectual disability and developmental delay accessing eKindy in remote and rural settings. <p>The Queenslanders with Disability Network (QDN) (No. 29) provides observations that children with disability experience conscious and unconscious bias and discrimination in accessing universal early childhood education systems and it is important that the legislation and subsequent policies around this do not deliver unintended consequences around access and equity of eKindy and eLearning programs. This submission also notes that it will be important that actions are taken to address the digital divide and digital exclusion of people with disability in implementation of eLearning programs. Families with low digital literacy and limited access to digital devices and challenges with affordability including parents with disability need to be considered and targeted strategies in place to support access and inclusion.</p> <p>ICPA Inc. (No. 32) supports the reform, noting that:</p> <ul style="list-style-type: none"> an essential element of the eKindy program is the interactions of all students when they travel for face-to-face activity days and the importance of engaging online delivery of an interactive age-appropriate program; without essential access to centre-based visits during the eKindy program, some students may not be able to access this crucial element of their kindergarten year; it is imperative that eKindy students continue to receive equitable access to the full range of services provided by the delivery of the eKindy program; and it is necessary that workforce shortages of Early Childhood Teachers are taken into consideration, and students are clustered online within their geographic catchment.
Outside school hours care	<p>QDN (No. 29) notes that out of School Hours Care (OSHC) is an important part of the education ecosystem, and it is important that children with disability are supported adequately with reasonable adjustments to be able to access and be included in OSHC. This includes adequate funding for staff training, accessible facilities, and tailored support programs, as well as clear guidelines to prevent discrimination and foster equity.</p>
Multi-Tiered Support System (MTSS) and School Disciplinary Absences (SDA)	<p>Submissions from PeakCare (No. 18), the Office of the Aboriginal and Torres Strait Islander Children's Commission (No. 21), QDN (No. 29) and Queensland Advocacy for Inclusion (No. 30) either seek implementation of the MTSS framework as a comprehensive and holistic model of supports with an umbrella approach covering three developmental domains (academic, social-emotional and behavioural) with the whole child at the centre, and the integration of supports across all three domains; or propose that suspensions and exclusions are implemented strictly as a last resort, safeguarding the educational rights and wellbeing of Queensland students, particularly those with disabilities.</p> <p>The Office of the Aboriginal and Torres Strait Islander Children's Commission (No. 21) further notes that the disproportionate number of SDAs being issued to children living in out-of-home care, children living with disability and First Nations children, suggesting that greater efficiencies would be realised by implementing appropriate responses to the intersectional vulnerabilities of children experiencing SDAs. This requires intentional, coordinated action from multiple portfolios to promote and protect the rights of children and young people.</p> <p>The submission made by Down Syndrome Queensland (No. 19) states that the Queensland Government should:</p> <ul style="list-style-type: none"> reinstate and mandate the transparent collection and publication of detailed statistics on students with disabilities, alongside First Nations students' data, to ensure accountability and informed policy development; launch an urgent, comprehensive investigation into the root causes of this over representation, identifying the systemic barriers and implementing targeted interventions to prevent unnecessary suspensions and facilitate swift reintegration into the school environment, similar to the depth of review conducted in 2020 in South Australia;

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	<ul style="list-style-type: none"> • implement Recommendation 7.2 of the Disability Royal Commission report to ensure there is accountability around SDAs being a last resort measure ‘all States and territory educational authorities... review all instruments regulating exclusionary discipline to ensure they... avoid the use of exclusionary discipline with students with disability unless exclusion is necessary as a last resort to avert the risk of serious harm to the student, other students or staff’; • implement systems enabling parents to have a right of appeal for suspensions of any length and provide parents with support to engage in this process; • hold schools accountable for students with disability receiving evidence-based reasonable adjustments, aligned with a Multi-Tiered Systems of Supports (MTSS) approach, to support academic, behaviour, and social-emotional learning and development; • recognise and address the intersectionality of identities of students who are overrepresented in SDAs – students with disability, First Nations students and students in out-of-home care as these cohorts need nuanced and holistic responses and supports; • support teachers through professional development about evidence-based practices such as MTSS; • consult teachers about their needs to ensure the support is targeted in areas where it is most needed; • use evidence-based professional development models, such as coaching and communities of practice; and • fund release periods within their timetables (non-contact time) to enable staff to have more time to collaboratively plan and evaluate inclusive practices and adjustments. <p>The submission from Queensland Advocacy for Inclusion (No. 30) recommends the introduction of Student Support Plans for students in particular cohorts who are at risk of receiving disproportionate school disciplinary absences, including students with disability, First Nations students, students in out-of-home care and students belonging to two or more of these groups. Further, the submission recommends legislative amendments to:</p> <ul style="list-style-type: none"> • require the Department of Education to avoid the use of SDAs unless it is necessary as a last resort to avert the risk of serious harm to the student, other students or staff; • provide an appeal right for all short-term suspensions; • limit the number of suspensions a student can receive within a prescribed period of time before a principal must obtain approval from the chief executive to issue another suspension; • ensure students with disability have access to educational materials appropriate to their educational and behavioural needs while subject to exclusionary discipline; • reduce the timeframe in which the Department of Education has to respond to submissions against suspensions and related matters to 20 school days after the Department of Education receives the submission; • require a principal to obtain input from a student prior to making an SDA decision; • establish an independent complaints process and clarify the decisions for which an external right to review at the Queensland Civil and Administrative Tribunal applies; • refer all students with disability who receive a suspension or exclusion to an individual advocate; • collect and publish disaggregated data on the use of school disciplinary absences in an annual report to the Minister, including data on the use of informal exclusions; • review the criteria for issuing exclusionary discipline and reduce the number of permissible reasons, including banning the use of suspensions for minor incidents; and • set out a list of matters to be considered by a principal when making a decision to suspend or exclude and require the principal to provide a response to these matters in an accessible format for the student and family. <p>QDN (No. 29) recommends that the Bill is amended to ensure suspensions and exclusions are implemented as a last resort with adequate safeguards around mechanisms to monitor and oversight decision making to ensure the rights of students with disability can access an inclusive education system. QDN supports the Right to Learn campaigns and actions that strengthen inclusion, the right to enrolment for students with disability, and implement robust oversight mechanisms to ensure compliance. Collaborations between mainstream and non-mainstream schools should also be fostered to promote smoother transitions and inclusive educational environments.</p>
Additional amendments to the <i>Education (General Provisions) Act 2006</i> for other matters	<p>QTU/IEU (No. 25) propose a number of amendments to the EGPA beyond the scope of the Education (General Provisions) Bill 2025:</p> <ul style="list-style-type: none"> • the Department of Education and the Queensland Government ensure that a specific budget impact statement and a separate workload impact statement are provided in any transitional arrangements arising from amendments to the EGPA and both statements are publicly available; • amend section 7 of the EGPA to recognise that the social purpose of schooling, that is to support young people to become socially responsible and to strengthen local and national cohesiveness, democracy, cultural richness and diversity;

Department of Education

Response to issues raised in submissions received on the Education (General Provisions) Amendment Bill 2025

Issues raised in submissions	Scope of issue
	<ul style="list-style-type: none">• amend the definition of public officer under section 340 of the Criminal Code to specifically include principals, teachers and other frontline staff working in schools and TAFE colleges;• the Queensland Government to deliver on its commitment to ensure zero tolerance for violence in school;• adopt legislative measures that will ensure the physical and psychological safety of teachers, school leaders and students is prioritised, and that appropriate funding and resourcing are provided so that all employees and students are safe;• ensure the Department of Education provides adequate training and resources to regional directors, school supervisors and safety advisors to eliminate or mitigate the risk of occupational violence; and• launch a public awareness campaign about criminal offences and consequences related to violence against school staff.