

## Education (General Provisions) and Other Legislation Amendment Bill 2024

**Submission No:** 3  
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**From:** [REDACTED]  
**To:** [Education, Employment, Training and Skills Committee](#)  
**Subject:** Concerns Regarding Proposed Changes to Homeschooling Regulations  
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Dear Committee Members,

I am writing to urgently express my deep concern regarding the proposed changes to homeschooling regulations, particularly the requirement for homeschooling families to adhere to the Australian national curriculum and the implication of reporting on all subjects each year.

I do NOT support the proposed bill as it is written.

While the Australian national curriculum may serve as a framework for some educational institutions, it does not necessarily represent a high-quality education for all students. It is not a document written for parents to use. It is a document that teachers spend four years at university to understand and create lessons from. I am a registered teacher in Queensland and I homeschool my children. I understand the documents well and I can see major issues with the implementation of this requirement at a legislative level.

Many homeschooling families have chosen alternative educational approaches that better suit their children's unique needs and interests. For example, two of my children began university studies at age 13, completing the national curriculum in its entirety by age 15. Similarly, my third child, who is still registered, has also completed the content of the Australian curriculum and is currently working outside of it. How would I report and plan on the curriculum if we have completed beyond the year 12 level of math? Or after we have deeply studied all the content in HASS and my children are no longer interested in these limiting topics? I noted that university study has not been listed as a suitable alternative and I question why.

Additionally, the burden of reporting on all subjects and providing proof of educational progress will add a significant challenge for homeschooling parents. Many people outsource this job and pay others to assist them. Adding to this burden increases financial pressure on parents who have often already given up a second income to homeschool. What help will be provided to empower people to do this successfully? Is there a budget for this help? Recommendations in the past have included the implementation of a 'body' between the people and HEU to help with contents and paperwork. Will this be instated, even if only for this transition time? Queensland has no representative association and much of the workload currently rests on the shoulders of volunteers, myself included. I'm concerned about the stress and workload this change will cause and we have no assurances that it will lessen the load for us or HEU in the long term.

The proposed requirement to report outside of registration times is a gross overstep of boundaries and adds unnecessary stress and pressure on homeschooling families. I can see no way that this could be considered fair or reasonable. A school child changing schools is not required to do the same, thus creating a double standard. If someone is

not registered with HEU then they are not beholden to HEU for that time. It's ridiculous to think that making them so is acceptable. Consultation with all stakeholders made this quite clear from the beginning.

Parents are in the best position to determine what is in their children's best interest when it comes to education. Mandating adherence to the Australian curriculum undermines parental autonomy and restricts the flexibility and individualized learning opportunities that homeschooling provides. It minimises the diversity in society on the whole on a long-term basis.

As someone who participated in the consultation process, I would like to express a complaint about the exclusion of genuine representatives for the community from many of the consultation steps. There was an obvious bias towards businesses with vested interests to be included and what appeared to be a deliberate exclusion of key players, namely myself and Patricia Fitzgerald. Rather than taking into account the diverse perspectives of homeschooling families the consultation process heavily leaned on the testimony of people with a vested interest in making money from the homeschooling community selling products already aligned to the curriculum that you're trying to add to this bill. This is unacceptable. At the initial information gathering stages of the process, our input was invaluable, as we were the only people there who were actually homeschooling in Queensland at the time and had a complete understanding of the expectations from HEU. We were however excluded from further consultation and I'm asking why now?

In conclusion, I strongly urge the committee to reconsider these proposed changes and to ensure that any regulations regarding homeschooling respect the autonomy and diversity of homeschooling families and hear their united and numerous voices.

Thank you. I'm sure this won't be the only correspondence I send regarding this matter and I'm happy to take a phone call for follow-up on [REDACTED]

Sincerely, Amanda Bartle

Dear committee members,

I have been deeply involved in the progress of the Education (General Provisions) and Other Legislation Amendments Bill 2024, from the first round of consultation. I am one of a handful of people in Queensland with a complete understanding of the process, impact and potential outcomes of these reviews. I have extensive experience writing homeschool plans and reports for HEU in Queensland, I volunteer within the homeschool community, administer some of the largest homeschooling groups on Facebook, provide resources to the community, run multiple homeschool co-ops and I am a registered teacher in Queensland, who is also a long term homeschooler of my own children. I think it is safe to say, I know more of the answers than just about anyone else in Queensland. I'm actively requesting inclusion as a witness in future public consultations.

I was also actively excluded from round two consultations because I am not part of an 'official' organisation. This point was mentioned in Forrester's briefing; I am one of those two people who were actively excluded from seeing the draft, despite her full understanding of my role representing the community and multiple previous conversations.

This background information is to give you insight into my deep level of understanding and why I **OPPOSE** the current bill and in particular **clause 18** section 7, the guiding principles, **clause 60**, the removal of all types of provisional registration without a plan submitted, expecting educational evidence outside of current registration period, **clause 63**, reducing show cause times, **clause 65**, removal of the certificate, **clause 68**, following Australian curriculum and excessive reporting expectations.

This submission extends upon my first, as I realised after watching the briefing how much more the committee needs to know to understand the impacts of these proposed changes, and to clear up misconceptions put forth during the briefing.

**The proposed bill DOES NOT align Queensland to the other states legislation.**

During the briefing it was made clear that the proposed changes were an attempt to bring Queensland's homeschooling legislation into line with other states. I speak nationally at homeschool conventions so I have a solid understanding of the processes within other states. I'd like you to know there is currently only ONE state in Australia that requires alignment to the national curriculum at a legislative level. That state is the Northern Territory. No other state legislates to ACARA or to the national curriculum. A few states do have legislation that requires homeschoolers to cover a wide range of subjects or to cover the eight Key Learning Areas (KLAs) within the National Curriculum (NC). These states include South Australia which mentions the eight subjects (but does not mandate registration or reporting on all eight), and Victoria (all subjects are mentioned but their legislation allows for exemptions). In the other states, Western Australia, Victoria, Tasmania, The Australian Capital Territory, and currently Queensland there are no requirements based on curriculum or subject inclusion.

New South Wales uses the New South Wales Educational Standards Authority (NESA) syllabus, not the national curriculum. Homeschoolers there have moderators, known as Authorised Persons (APs) doing home visits who can support home education families to make those

alignments on a one on one basis and there is also the potential for a two year registration period. Queensland has a paper based system, no moderator in person visits and absolutely no government level support to complete the required planning and reporting. Unlike in Victoria, South Australia, the ACT and theoretically New South Wales, where there is a panel of parent experts who sit between regulators and the community to assist the community, support for homeschoolers in Queensland comes from a small team of volunteers from within the community organised through Facebook. We volunteers, do not have time to take on this mammoth task of teaching 10,000 people how to align to the national curriculum and we know HEU does not have the staff to do the task themselves. Has consideration been made to this?

The basis of this clause to align this to other states is spurious when only the Northern Territory legislates this way. Queensland homeschoolers are currently required to include a range of subjects in their planning and reporting at a policy level. HEU feedback in the past says we are doing a good job of this. All but one state in Australia deals with this at a policy implementation level and all those states that do require alignment to the national curriculum at policy level provide support or in person visits to help achieve this. How will the HEU provide this same level of support to align to what is available in other states?

#### **Recommendation**

- Seek a high quality education in Queensland that takes into account the diverse needs of Queensland residents, without looking to copy other states.
- Remove mention of the national curriculum in legislation and keep the words “high quality education”
- Install a representative body between HEU and the homeschooling community, comprised of people with actual homeschooling experience.

#### **The national curriculum is not a suitable definition of high quality education.**

Defining a high quality education as aligning to the National Curriculum assumes the National Curriculum IS a high quality education. That is not its purpose, nor has it been written to stand in legislation as ‘high quality education’. It is a baseline education to be used by schools. There is no research to demonstrate it is responsible for improved academic standards, just as there is no research that homeschoolers are not currently providing high quality education without it. Legislative changes should be backed by research when they are as significant as this will be. It is noted that 80% of all homeschoolers will need to change the way they homeschool their children to meet this proposal with absolutely no research to suggest it is going to result in better outcomes for these homeschooled children. In addition, this definition as stated excludes the use of university study as part of a high school education, something that many homeschoolers access from age 13 onwards, including two of my three homeschooled children.

#### **Recommendation**

- Maintain the current wording and leave defining ‘High Quality’ to the Home education Unit at policy level.

- Acknowledge that 80% of homeschoolers do not currently use the National Curriculum and thus do not want to and that requiring it removes their rights to choose an education that meets their families needs.

### **The child safety concerns are not solved by this proposal.**

The guiding principles of this bill were also pitched as being a response to child safety measures. I respectfully ask the committee how these changes in any way make homeschooled children safer? There is no clear link between these two notions. Queensland has a paper based home education system, with zero sighting of the children. There is no opportunity for HEU to monitor child safety in this process. Even in New South Wales, where the children are sighted, there is no data to suggest NESA has ever had cause to report a child to child protective services. If the children are already known to child safety, then surely they already have the powers they need within the child safety legislation to keep these children safe? It's a massive jump from one child who committed suicide, who was known and in the care of protective services already, to such a large legislative change that challenges every homeschool parent's right to homeschool their children. What new departments, powers, funding and training will be needed to police this change?

### **Recommendations**

- Keep child safety concerns in the child safety sections of legislation
- Do not impose extra child safety legislation on one subset of the community in this discriminatory manor

### **The intention to lower the burden of compliance and HEUs workload is not met by these proposals.**

It is well known that NSW and Queensland currently have the most onerous and difficult planning and reporting requirements. This bill sets up an increased burden on both homeschooling families and the HEU, and would see our expectations exceed those of NSW. Under the new proposal, parents would need to 'demonstrate academic progress' across all areas of their plan in their annual reports. I'd like to point out that no school anywhere in the country is held to these impossible standards! It is unfeasible and discriminatory to expect to see academic progress across all subjects for every child every year. A large percentage of the homeschooling population identify as neurodiverse. Academic progress can be hard won and take many years for these children. An expectation to demonstrate it in every subject every year will increase non compliance and greatly encourage increasing numbers of unregistered families.

It is also worth noting that the HEU is currently struggling to keep up with the workload they have now, with reporting assessment taking up to 4 months in the last few years. This extra requirement to report on all subjects, rather than the current three that we have now, more than doubles their reporting workload. HEU will need more staff to manage this increase.

### **Recommendations**

- Remove all mentions that require homeschoolers to “demonstrate academic progress” as they are impossible standards and discriminatory to both homeschoolers and neuro-diverse or disabled students.
- Remove requirement to report on all areas of the submitted plan, in favour of 3 subjects as we currently do.

**Provisional registration time is needed for child safety and financial equity.**

Removal of provisional registration entirely is a shortsighted view on child safety. The reality of the situation on the ground paints a very different picture.

Many parents come to homeschooling as a last resort. Many don't choose it and many have no warning until the day they need it. These parents come with school trauma or child safety concerns due to the failure of the school to keep their children safe and ensure their mental and physical well-being. These same parents deserve to be given some time to create a learning plan for HEU that truly presents a high quality education for their specific child's needs. This expectation is not something that can be prepared overnight. I'm a registered teacher who has created hundreds of plans for Queensland homeschoolers and I would struggle to do this overnight. Especially for multiple children within the same family!

Removing this guaranteed provisional time means that families miss out on time to heal from trauma, experience unnecessary costs and stress and are unable to take time to learn how to provide a high quality education. These costs would include paying for doctors visits for school exemption, and missing out on AIC and centrelink exemptions. If providing a high quality education is the goal of this legislation, we want parents to make informed choices and create plans with confidence, not a rush overnight job to ensure their children don't have to spend another risky day in school. I would suggest that removing the provisional form is acceptable if the remaining policy allows for automatic provisional on simple application and ALL homeschoolers have a 30 day window to create and submit a plan. This 30 days would represent less time than schooled children received on their holidays and is also in line with what homeschool families were originally consulted on in round one of this bill consultation process. The current wording of the proposal removes any possibility of a 30 day window.

**Recommendations**

- Provide instant provisional registration upon a simple application process of name and address.
- Provide one registration form that gives all new applicants thirty days to provide a plan and other needed paperwork.
- Instill a representative body between HEU and the homeschooling community to help educate, support and inform new applicants to ensure they succeed.

**A certificate demonstrates authenticity to the public.**

Removing the certificate of homeschooling seems like a small thing. However, the homeschooling population use these certificates as a way to authenticate their homeschooling experience in the eyes of Centrelink for exemption from mutual obligations. It also provides, to

family and friends, something tangible to be proud of, and for businesses (like Seaworld, and various museums) to allow access to school-type discounts. Without the certificate, Centrelink will need to rewrite policy and be retrained, and we will be fighting businesses for legitimacy. Is it really that much to expect that the state's Home Education Unit cannot provide us each with one single certificate of registration at the beginning of our homeschool journey?

If the aim is to reduce the burden on parents, drop the requirement to return it on cancellation of enrollment. Most parents don't return it anyway and keep it as a memento of 'that time we homeschooled'. Replacing it with a letter, which may impose conditions, is a clear demonstration of how unimportant we are as a sub-group of educators to the Department of Education. With our rapidly growing numbers we deserve more respect and support, not less.

### **Recommendations**

- Provide a certificate at registration approval that does not contain extra conditions. Either digital or physical would be acceptable.

### **This Proposal is not backed by research.**

I would like to draw attention to the fact that this legislation change is not backed by any research. All available research, and I do admit there just isn't much of it, points in the opposite direction to the path this bill took. Where is the evidence that ACARA is a high quality education? Where is the evidence that homeschool children will be safer under these guiding principles?

During the briefing, we were told that 500 people filled out HEUs survey for their evidence gathering purposes. 5% of currently registered homeschoolers. It was acknowledged that this number was low. Yet only 300 homeschoolers participated in round one of the consultation process and that is somehow considered adequate representation. Further research is required for legislation change.

### **Recommendations**

- Reject the national curriculum inclusion as not being backed by research to increase academic standards.
- Reject the guiding principles due to a lack of evidence it will make any significant difference to child safety.

### **Inadequate and biased consultation formed this bill.**

I've been involved in this proposal from the first opportunity and will be to the last. I'd like the committee to know that the consultation process was inadequate and biased.

Round one's consultation paper, was pitched as information gathering, and approximately 300 responses were gathered. What we were consulted on at that time looks nothing like this end bill. The feedback homeschoolers gave was not considered in the creation of this current document. I urge the committee to ask "How many homeschoolers indicated they wanted alignment with the national curriculum during the consultations?"



I participated in two meetings between round one and round two, where all stakeholders shared the same thoughts on the many inclusions and were unanimously against the inclusion of the National Curriculum. These meetings have officially not been considered consultation, possibly so they did not need to consider the strong stance all stakeholders shared on this point.

Then round two of the consultation process was flawed. At the briefing it was stated that six associations were consulted. There are not that many homeschooling associations in Queensland and if we extend to those representing Queensland we get a total of two. So there were not six associations in that consultation round. There were two and one of them did not see the draft. The consultation process did include a business (possibly two of them, unconfirmed as yet) based in NSW that sells curriculum to homeschoolers that just happens to align to the national curriculum. Consultation literally included a business that stood to gain profit from their own inclusion in the process, while actively excluding the public's choice of representation, myself and Patricia Fitzgerald. I myself requested to be included in this round, emailing the then education minister's office for inclusion, and was still excluded. I was not alone in this exclusion. I ask the committee to consider the fact that the consultation process was lacking and that the consultation that did occur in no way is reflected in this bill, beyond the increase to age 18 for registration. Many homeschooling families feel as though they have not been represented in the consultation process at all. Genuine consultation with the home education community of Queensland did not happen, ethically we cannot pretend it did. The volume of submissions you have received clearly demonstrates this fact.

Further to this, at this time, about half of all registered homeschooling families in Queensland have still NOT received the notification email from the HEU informing them that this bill has been tabled and that submissions are open. This appears to be a deliberate step to minimise submission responses but it could also be mismanagement at HEU, who are aware of the problem and have not rectified it.

### **Recommendations**

- Include true Queensland community representation in all further consultation opportunities. Ask the homeschooling community who represents them.
- Install an organisation between the HEU and the homeschooling community, made of people with homeschooling experience to ensure true representation occurs in future and in policy creation.
- Reject proposals the community has clearly and numerous highlighted in their submissions, due to a lack of genuine consultation.
- Remove businesses that stand to profit from the consultation processes as they have vested interest, and ensure they do not participate in policy construction.
- Determine if any of the consultation outcomes from homeschooling families actually made it into the bill.
- Consider the submission numbers as representing half of what would have arrived had HEU notified all relevant stakeholders, their registered families.

In light of all this, and I could write another three pages to be honest, I felt the need to add more to my submission.

**I would like to be called as a witness to share more information and answer questions at the public hearing opportunities. I believe my extensive knowledge of the current system, understanding of the communities broad needs and personal homeschooling experience would be a valuable addition to the committee's understanding of this bill.**

**Amanda Bartle**

