


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

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20 March 2024

Committee Secretary  
Education, Employment, Training and Skills Committee  
Parliament House  
George Street  
Brisbane QLD 4000

Dear Committee

I have a tertiary education and qualified as a Preschool/Primary teacher and am a mother of a large blended family with 10 children and grandmother of three homeschooled children and have had a lot of experience with schooling over the years and know the very real challenges for parents of neurodivergent learners as well as for teachers in striving to do one's best for all children in a classroom setting.

I wish to express my deep concerns with the proposed amendments to the Education (General Provisions) and Other Legislation Amendment Bill 2024.

***My Experience***

One of our children was still not able to read after 4 years of regular schooling. In the early grades particular teachers had labelled this child as lazy and had largely given up in trying to teach an otherwise bright and energetic child. I realised that the only other option was for me to teach that child to read at home after which that child now leads a productive life, has successfully completed training in a trade and has worked hard and has managed two privately owned businesses.

Another of our children was struggling with bullying and sexual abuse in high school. That child's grades declined significantly but fear of retribution meant that we were not told what was the root cause of the panic, despair and stress exhibited by the child for quite some time. When we finally found out, we immediately withdrew the child from the school. It took several weeks for us to determine what was the best way forward. Eventually we found a private school where the child felt more at ease, settled down and started learning again. The point here is that we could very well have chosen to homeschool instead. We were fortunate that at the time a suitable alternative was available but sometimes that is not an option for some parents to take. If the proposed removal of the 60-day provisional was in place then, we would not have been able to take the time needed to assess the situation and research prospective alternatives in order to make the choice we made. Some decisions require serious assessment and research. Expecting a choice to be determined immediately is rarely even possible - especially when children have been damaged by their previous experiences.

Expecting immediate full registration will cause unnecessary additional trauma to children in such situations as well as inordinate pressure on both the educating parents and HEU, Is HEU to be more fully staffed to administer such immediate transitions?

I felt another of our children was simply not ready for school but enrolled that child anyway to obey the rules as I understood them at the time. That child simply did not cope. The following year, when I wanted to have that child repeat the year at a time that would not have caused as significant social repercussions for the child, the teachers insisted "No the penny will drop. It will be okay." The child did not comprehend the work and was not progressing with reading or with maths. Again I felt the child needed to repeat the year but again the staff insisted that that was not necessary and I allowed them to decide for me against my better judgement. The following year that child was "caught in the net" and the teachers called me panicking that the child did not have the prerequisite knowledge that they insisted would not be an issue. It was no surprise to me since I knew the child was not coping. I regret so much that at the time, I did not take know to make the decision to homeschool for at least the child's first year of school. The child was diagnosed with auditory processing disability and required an entirely different approach to teaching. Again three whole years at school had been wasted.

I was interested to learn that in Finland children are not required to begin their formal education until age 7 before which age they are recognised as learning more through play. At age 7 they are recognised as generally being more ready to start a more formal education. Finland is recognised amongst an array of educational papers as having one of the best education systems in the world because of its focus on individuals and their needs and the importance of play in early childhood - a pedagogy which ACARA seems to de-emphasise.

While I did not actually transition my children to being home-schooled, looking back I should have - particularly in the early years. There was nothing gained by sending some of them to school in those earlier years that only resulted in causing them trauma that persisted to some extent throughout much of the rest of their schooling.

I saw first-hand the enormous difference home-schooling made for my grandchildren who were homeschooled.

One of our grandchildren also could not read a single word after 4 years of regular schooling. This child was relentlessly bullied at school and even the mention of school was enough to send him into a panic. Occasional "education support" didn't help. That child developed a physical health-issue as a result of severe anxiety and Mum decided to homeschool. After informing the school of her decision the teacher said, "She may as well because [the child] just cries all day anyway". That was the first time Mum was told how bad the situation was. Why hadn't the teacher tried to ascertain what was the problem before then? Mum just knew then that school wasn't ever going to work for the child with such an attitude from the teacher. At that same school Mum was also asked to keep the child home on the days of Naplan testing. Why? Choosing to homeschool required a transition phase because formal lessons like those at school sent the child into absolute panic at first. Eventually the child settled into a new routine, relaxed in the non-threatening and supportive environment and started learning. Within 12 months of leaving formal school that child could read and finding a teaching approach to teach children with dyslexia made an enormous difference. That child needed a completely different approach than was available at the school.

Another of our grandchildren is gifted and became bored at school. Failure to recognise individual differences and the child's need for more challenging work resulted in wasted time and behaviours which distracted other students and annoyed teachers. That child after being homeschooled, entered university studies prematurely compared to those enrolled in a regular state school education and is doing very well.

Mainstream schooling with ACARA based curriculum let these kids and their parents down. Why? Overwhelmed or busy teachers with classes of 25-35 kids do not have the time, attention, and sometimes the energy or even will, to actually focus on the needs of individual children - especially those who learn differently from other kids even though the requirements for teachers and the aims of the educational system specifically mention establishing individualised learning experiences and opportunities that cater to the differences between individuals. That clearly did not happen for the members of my family that I have spoken about. How many other families are experiencing the same? Perhaps the increase in registrations for homeschooling is an indicator of systemic failure for many more children in Queensland.

## **ACARA**

Firstly Let me refer you to the report, "Australia is now in the world's top 10 academic performers – but the data paints a complex picture" [[https://www.abc.net.au/news/2023-12-05/pisa-international-school-rankings-in-maths-science-reading/103185468?fbclid=IwAR3\\_UuXOeZUK-OBu9pVdlqCQN7Yb\\_Gr\\_9-9BUFzwkdbjxwu5NiBLoQdExI](https://www.abc.net.au/news/2023-12-05/pisa-international-school-rankings-in-maths-science-reading/103185468?fbclid=IwAR3_UuXOeZUK-OBu9pVdlqCQN7Yb_Gr_9-9BUFzwkdbjxwu5NiBLoQdExI)].

While Australian politicians could pat themselves on the back the reality is that every nation's educational performance actually dropped, ours included, during and since the pandemic and the report makes it clear that much of our student academic performance has dropped since the early 2000's. That is in spite of using ACARA so something is wrong and insisting on basing all homeschool education on ACARA is not going to benefit anyone especially not our kids. "Teachers want to focus on the kids in their classes," teacher, Roger Amey, said. "But we have so many requirements about data keeping and compliance and so on that we don't get to do the most important stuff in the classrooms." It seems that the Queensland government is unaware that this is the case but they must realise that imposing on homeschooling families, the very same conditions under which trained classroom teachers struggle is not going to make one iota of difference to the outcomes for overall educational achievement across the broader population. It will simply mean that we have more kids struggling once again. Why impose a system that is clearly not up to the task, on even more learners? To do so after being alerted to this situation would clearly indicate a political agenda being used against many of our most vulnerable. For this reason I suggest the members of the committee take seriously every argument put forward and listen to those who will be most affected by these proposals (**the Stakeholders**). As far as I understand, few if any of these stakeholders were ever consulted in the process of formulating this current proposed bill. If they had and the result reflected the advice given there would not be this current flurry of activity to ensure politicians know their displeasure at what is being proposed.

As I have read through ACARA my main concern is to know just how much flexibility is the government going to allow homeschooling families in the practical application of the Australian Curriculum in their children's learning experiences in the interest of their children's individual attributes and concerns?

I've met a number of parents who homeschool their children and have found them all to be very caring parents who want the very best for their children and are prepared to sacrifice much in order to give them the best opportunities they can. Many have children who are neurodiverse or have various other learning challenges. Some have children who have health issues and some have itinerant work for which homeschooling provides some sense of continuity and stability in their children's education. Such decisions made by these parents should be applauded since they clearly care about their children and their future opportunities. Sadly I know a number of parents whose children, like my child and grandchild, have been bullied relentlessly in regular school and those children are much happier and feel much safer when home-schooled. How can children do their best and concentrate on their learning in a setting that causes them to be fearful, panicky and stressed on a daily basis?

The people most prepared to be able to determine what is in the best interests of their children are the parents. With regard to safety and welfare of the children - this is one of the reasons many homeschooling families make the decision to homeschool. In spite of school policies and affirmations, bullying still exists in schools and certain children with differences are often targeted. For many of these kids, returning to school is not an option because of the stress involved for both child and parent so it is important that the homeschooling model allows sufficient flexibility to proceed in a way that is less stressful and more supportive for both parent and child - especially when there are disabilities or other challenges involved.

Often prescriptive programs specify what children are to learn in stages in specific years at school and tests such as Naplan are designed to show whether those skills have been developed within the age-range expected. Can the application of ACARA to homeschool education be adaptable by parents to allow for the many varying stages of development of children with different learning paces, styles and abilities without detriment?

Trying to implement a program that does not take these things into account does not allow education to be "conducted in an environment conducive to learning". Even for children who don't have learning challenges but who have been bullied, the learning process sometimes requires going back to consolidate the basics before progressing on to other learning. This does not appear to be specifically allowable under ACARA which stipulates the learning schedule year by year. Of course for some it may not be a problem but for many it just may be, so flexibility is key to home educators being able to plan and effectively teach their children

How will the government apply ACARA to homeschool education without being so prescriptive in its expected implementation, pacing, timing, reporting requirements and expected outcomes that it negatively engages with individual households if such outcomes are not all met in a single year?

Will ACARA allow flexibility in not specifying exactly what, when, and how children are to learn according to the curriculum each year?

Will the outcomes of ACARA be required to be applied per year or as an overall accomplishment by the end of their schooling?

Some children progress socially at a much slower pace than others and many go through cycles in their social development. These children need the flexibility of being able to develop social skills at their own pace with the support of parents who stretch them just

enough without causing them significant stress by being attuned to their moods and confidence levels on a daily basis. Will applying ACARA in a homeschool setting also allow this level of flexibility?

Will the government's application of ACARA to homeschool education also allow children who progress much more quickly than others, to progress at their own pace in a range of rich learning experiences that are actually valued and appreciated by the child but which may be beyond the norm in the timing or stage of application according to ACARA?

The preamble and aims of ACARA sound wonderfully inclusive but the application by the government has the potential of being anything but - largely depending upon how rigid the government is going to be in its expectations around homeschool implementation of the guidelines and how much flexibility is allowed.

Statements in ACARA such as “(b) The Australian Curriculum is presented as a continuum of learning that makes clear to teachers what is to be taught across the years of schooling. It makes clear what students should learn and the quality of learning expected of them as they progress through school.” can be problematic or supportive depending upon the government's interpretation and application. Does this mean that there are specific skills and knowledge to be taught and learnt in particular years or does it mean that the skills and knowledge is to be taught and learnt throughout the child's education with the continuum presented as a guideline to be used over the course of their education but not necessarily restricted to specific years?

ACARA states that “Successful learners:

- develop their capacity to learn and play an active role in their own learning”. [Will this mean that the government will allow flexibility across the program not specific to particular years? If so, is there a need to lean on ACARA as opposed to other educational approaches or plans?]
- have the essential skills in literacy and numeracy, and are creative and productive users of technology, especially ICT, as a foundation for success in all learning areas [Because attaining these skills in literacy and numeracy are the foundations and scaffolding upon which other knowledge and skills are built, will the homeschool application of ACARA still allow kids to learn at their own pace and at the time when they are actually ready to assimilate basic and subsequent knowledge? Will it be flexible enough to allow repeated consolidation of basics over 2-3 years if needed by some children?]

Will the new requirements increase pressure to conform or keep up or match other's levels of achievement and still cause stress that was a problem for many in mainstream schooling?

If it is not flexible enough nor supportive of homeschooling families enough but rather too prescriptive, it is likely to lead to failure or tendencies to give up which then lead to diminished feelings of self-worth, distorted self-awareness and personal identity and hinder students' abilities to learn to manage their emotional, mental, spiritual and physical wellbeing. Failing to recognise an individual's differences in prerequisites and learning styles, paces of understanding and attainment and achievement set these individuals up for exactly the opposite to the objectives expressed through ACARA in spite of its assertions of meeting individual needs.

***Guiding Principles.***

## Clause 18 Section 7

Changing the choice of words from “of” to “for” indicates a subtle change to a more dictatorial attitude of government towards homeschooling families. “Of” is more indicative of an essential nature of parenting whereas “For” is more indicative of making parents accountable for their choice to someone else such as the government. Currently what is necessary is proving to the government that parents are providing an educational environment for their children. With the changes proposed the emphasis is on proving to the government that parents are teaching their children in a manner that the government dictates is the only way to teach them, which by its very nature, totally ignores the needs of individual children and contradicts the expressed essence of ACARA and ignores the parent’s right to judge what is most suitable for the child. In fact much of ACARA is contradictory to the notions of teaching according to individual learning styles, readiness and abilities.

The inclusion of Section 7 (b) (iv) “recognises wellbeing as a foundation of educational engagement and outcomes for children and young people” is another contradiction in terms. How can one do so by implementing a prescribed system that does not take into account individual differences in its specified implementation?

The very suggestion that it could be prescriptive and families compelled to implement it in dictating what, when and how children are to learn, is the very reason why homeschooling families are seriously concerned. The fact that such an educational program is not suitable for homeschooling families who have very often chosen their path because mainstream schooling using ACARA did not work for their children is what is frightening the homeschooling community. For them, compelling them to go back to a prescribed program such as ACARA is going backwards and setting up at home, much the same conditions they were trying to circumvent by choosing to homeschool.

By stipulating the need to apply ACARA, the government is setting up a situation which ignores family and cultural differences while professing to be more inclusive.

### ***Safety and Well-being of children***

Specifically including this wording “(i) in the best interests of the child or young person taking into account their safety and wellbeing;” indicates that the government assumes that parents who homeschool do not make decisions regarding their children that take into account their safety and wellbeing. It should not have to be mentioned if the government believes that parents are doing so. It also implies that the government has a monopoly on being able to determine what is in the best interests of the safety and wellbeing of all.

Clearly government education was not implemented in a way that did this for members of my family so what makes the government’s judgement on what is more suitable for the safety and wellbeing of my children and grandchildren more appropriate than ours? We have a close personal relationship with our children that has been growing since birth. The government does not have such a relationship with our children - it seeks only to implement power over us and our children and that is certainly not in any of our best interests for our safety and wellbeing and ignores our basic rights as autonomous human beings.

The government wanting to ‘MAKE home educated students follow the Australian Curriculum’ (Chris Whiting) implies that no alternative is more suited to a particular individual - clearly this does not indicate an approach that “takes into account the safety

and wellbeing” of the children when those children have already fully completed the curriculum or when children have learning challenges that don't allow the child to fit into the box the government has prescribed for it, or when particular children have already been failed by that very system because of their individuality.

I am aware that the government may be emphasising the clauses “ in the interests of the child” and “safety and wellbeing” to cover for occasional situations of parental neglect or abuse. From my experience those are not situations typical of registered homeschooling families. These families are willing to commit to a high level of planning, effort and sacrifice involved in running a home-schooling program and reporting as already required by the HEU.

The families more likely to abuse and neglect children are much less likely to commit to such a high level and are much more likely flying under the radar with either non-enrolment in any education program or high incidences of truancy from mainstream school and not reporting to anyone regarding their children's education. If seeking to address the problems of neglect and abuse I believe the proposal is targeting the wrong demographic by focussing on registered homeschooling families.

It is naive to think that children are any safer at school than in a homeschool environment. The incidences of bullying seem very much to be increasing in spite of school anti-bullying policies and programs and many children are now homeschooled because of the threats to their well-being in schools. The parents of those children who were withdrawn from those circumstances and homeschooled were the ones who really did take into consideration, the safety and well-being of their children to the extent of doing something positive to protect them - it wasn't the government or the schools or the teachers who protected those children.

Sadly it appears that the death of a single homeschooled student due to suicide has been pounced upon and used by the government to espouse the need for further regulation of homeschooling. I would ask how often students attending public schools attempts or succeeds at committing suicide and how many others struggle with suicidal ideations? How many times have we had the education department suggesting the need to change the education system due to such stats?

### ***Reporting (Clause 68 Section 217)***

Reporting requirements for homeschooling are already quite onerous and give government more written progress reporting of homeschooled children than what parents even get from schoolteachers in the public education system. The need to homeschool children during covid seemed to alert many parents to the fact that their children did not know as much as parents were led to believe. I think the fact that this identified significant holes in their children's education has also been an important factor influencing more parents to consider homeschooling as a viable alternative - in accordance with their parental responsibility to choose a suitable educational environment. They recognised the need and acted accordingly to rectify the situation for the sakes of providing a high quality education for their children only to now be considered as irresponsible or errant in some way by a government seeking to impose greater control over them. Those parents identified significant failures in their children's formal schooling that was not formerly reported to the parents whose responsibility it is to choose a suitable educational environment for their children.



In true contradictory fashion, the proposed changes are indicating that the parents of these children are the ones who must provide much more in-depth reports about their children's learning than they were ever provided with by the school system.

I see no reason to change the current model for the reason that in some years, homeschooling parents and children feel the need to focus much more on some aspects of their education than others for extended periods of time which then restricts time available to incorporate all other subject strains across the curriculum. This then makes it difficult to report adequately for all other subjects in those years. Literacy and numeracy cross subject boundaries and are indicative of progress. Integration is a feature of many homeschooling approaches. Including another subject each year as is currently required demonstrates that other knowledge and skills are still being developed and introduced in the homeschool program even if not at the same pace as with other curriculums .

What matters is the levels of skill and knowledge at the end of their education years and none of us ever left school knowing all that was needed to be known anyway. We had the basics of enough to help us on our way and hopefully a thirst for knowledge that would encourage us to seek lifelong learning and the knowledge of how and skills to obtain further knowledge.

Requiring home educators to report across every subject in ACARA places an unnecessary burden upon home educators. Originally the onus was on parents to choose a suitable education environment for their children and existing reporting requirements demonstrate that but the requirement to report across the full extent of the curriculum makes it clear that the government subtly implies that home educators are doing something wrong if they place more emphasis on one subject than another in a given year while incorporating their children's interests and abilities, etc. If a parent is teaching a child according to the needs and level of understanding of the child which is according to the professed approach to education by ACARA how can the parent report across the entire curriculum if the child is more ready to learn some knowledge but not ready at all to engage in other learning at a particular point in time? This is just another contradictory requirement that will only place added stress and unrealistic expectations upon some parents.

This is particularly the case when many homeschooling families are already dealing with a range or combination of other issues that contributed to them deciding to homeschool in the first place, eg. response to school-based or other trauma, stress, physical health issues, PTSD, learning challenges such as ASD, ADHD, auditory processing disorder, etc. Unless you have dealt with these issues yourself, you have no idea of the time it takes to learn how to handle these issues and to make the necessary adjustments to all aspects of life to deal with the added responsibilities and challenges these issues place on individuals and families.

I do not agree that the reporting requirements need to change regardless of whether ACARA or any other educational program is used. I think the reporting requirements are satisfactory as they currently are and provide home educators with sufficient scope to choose what and when to teach particular subjects according to individual interests and differences as well as the flexibility needed to do so according to individual needs.

### ***Ethical Issues***

I read how ACARA is designed to develop “ethical understanding” but I can’t help but be concerned when politicians promote these supposedly benign and supportive restrictions by way of proposed changes using words such as “Make home education students follow the Australian Curriculum” (Chris Whiting MP Facebook comment). I do not believe Compulsion is an ethical approach to education in a democratic nation nor do I believe that compulsion has any place in government dealings with constituents in democratic nations. Such are the words used by dictators NOT employees of democratically elected governments.

As I understand it the present plan does not recognise parental rights to seek education for their children under either

Because of some experiences I have had in the past I have grave concerns that no matter what we say, our concerns will not make one iota of difference to the plan that is expressed in the bill as it is at present. This presents certain other ethical issues that definitely undermine this expressed purpose in the bill. I would like to think that common sense and compassion would yield a different result but I really do not know if that will be the case.

I attended a meeting with a minister to do with another issue at one stage. That meeting was scheduled by the minister’s office and we had no idea that parliament was actually sitting at the time. When the bell rang, our meeting was cut short and the minister excused herself and left, asking a minder as she left, what she was to vote. She did not ask the issue so I presume she had a schedule of the issues to be discussed that day but it was clear to all of us in that meeting that she was told what to vote when we knew she was not in the parliamentary meeting listening to the debates.

On another occasion I had the opportunity to sit in the gallery and witnessed a debate that was held. I was appalled to see that only 7-8 members of the sitting government were actually in the chamber listening to the debate with a couple of others coming in and out at various times. The opposition had more members in the chamber.

At the time, it was obvious what the vote should have been by the lack-lustre arguments not supported by any scientific or factual information (only personal opinions lacking any actual knowledge on the issue) that were put forward by the government mp’s in the debate over the issue as opposed to the science-based and evidence-supported arguments put forward by the opposition on the issue. It was clear who had obviously done their homework.

When the bell rang, the members of parliament came into the room like ants out of an anthill, and the vote was taken and the nonsensical arguments won the day. They had not been in attendance to listen to the debate so we presume they, too, had asked their advisors, what to vote.

How can the public be assured that this bill has been properly debated and vetted with individual mp's voting on its substance, value and importance to our society when we now know from experience that the system is actually broken and that it will be passed simply because mp's vote what they've been told to vote and not according to their individual appraisals of the arguments put forward, nor even according to what their constituents ask them to vote on their behalf?

Such a system makes a farce of any professed "commitment" to having a democratic govt that promises to "listen to the people".

I have witnessed what is now our current system and am of the opinion that our democratic system has been well and truly destroyed by party politics even to the point of closing ranks when it comes to voting on issues.

Might I suggest that you actually advise your peers and all of the advisors that this issue is to be voted on its merits and support from those whom it will affect - not a party-determined ideology regarding education which is evidently one which is dictatorial in its approach as evidenced by the choice of wording by certain mp's in asserting that they will "support the minister" (ie. not support my affected constituents who do not support the bill) or that the govt will "make home education students follow the Australian Curriculum" (no choice in the matter) with no regard to the reasons why homeschooling families have made the decisions to homeschool in the first place.

Unless you insist that mp's have freedom to vote according to their consciences and their communication with their affected constituents (THE stakeholders), you and I both know that in spite of what is discussed in the committee meetings, the result will be the same bill reflecting alp ideology and it will be voted on by mp's obeying the party (not their constituents who are the stakeholders). It will then be passed simply because of an ideological world view - not according to true democratic process. The result will be more legislation that is ultimately not supported by those it affects, of no benefit to our society in the long run, and which ignores the needs of a minority group and overrides what is best for meeting their individual needs and actually ignores the safety and well-being of many of the affected students in spite of what the lofty goals profess.

That is not fair to those people; is not representative of what the government would have us believe is their sympathetic support for all and is not ethical nor morally supportive of what our system of government is supposed to be.

### ***Summary***

If ACARA is not to be as flexible as it needs to be to cater for children in homeschooling situations, then I find the proposed changes to the education for children in Queensland to be enigmatic in that it seeks to "remove gender specific language to promote inclusion and wellbeing" to allow for differences on one hand but then, seeks to impose a prescriptive program that would treat all children as the same while expressing the intention of meeting individual needs without allowing the scope to allow that to happen on the other hand.

In referencing what research into the use of NAPLAN data shows I came across a report which stated, 'Overall, our research suggests that students' writing skills have declined over 7 years (2011 to 2018), with many high school students significantly behind the expectations outlined in curriculum documents.' If the program is not even successful in schools with teachers trained to deliver, what point is there in imposing it upon homeschooling families? Could the report actually be identifying the end result of imposing a program in schools that cannot deliver on its stated outcomes because it is inherently difficult for teachers to take into consideration the innate differences between individual children while trying to deliver a program that largely ignores those differences and expects children to all be at particular stages of development at the same time, all learning at the same pace and all interested in learning the same material at the same

time as well as able to develop the same skills to the same extent in the same period of time???

As I understand it the present plan does not recognise parental rights to seek education for their children - a position that is recognised and supported by the UN's Universal Declaration of Human Rights Article 26 wherein it states "Parents have a prior right to choose the kind of education that shall be given to their children."

Thank you for considering my concerns. Please change what needs to be changed in accordance with the needs of home educators struggling to do their very best for their children in providing a high quality education that is both flexible and responsive to individual needs, learning paces and styles and particular circumstances and ensure that the resulting bill clearly allows flexibility in practice rather than professing to be supportive and inclusive of differences while implementing in practice, a contradictory political system that potentially discriminates against disability, neurodivergence, giftedness /asynchronous development and other reasons such as health, itinerant work, religion and personal choice

Sincerely,

██████████

Please redact my name and contact details before publishing my submission.