

Education (General Provisions) and Other Legislation Amendment Bill 2024

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Dear Education, Employment, Training and Skills Committee,

I am writing this letter regarding the proposed changes to the home education laws in Queensland, introduced as part of the Education (General Provisions) and Other Legislation Amendment Bill. I am a second generation home educating parent of two children (aged 9 and 11) based in East Brisbane, and I have some serious concerns regarding some of the provisions in the bill, not just as they pertain to my own family's unique circumstances and experiences, but as they pertain to the specific needs of many other home educating families with whom we regularly spend time.

As I understand it, based on my reading of the bill, one of the most significant changes being proposed would result in home educating families needing to begin adhering to the Australian National Curriculum. I believe that this would be incredibly damaging for many of the families who benefit most profoundly from home education as it currently exists in Queensland. Many of the families that we have gotten to know through home education groups have chosen to home educate specifically because one or more of their children is neurodiverse in one way or another (such as living with intense anxiety, ADHD, or autism spectrum disorder, for example). For every single one of these families, the decision to take their children out of school was in no way something entered into lightly; in many instances, however, one of the key factors in their decision making processes was the fact that choosing to home educate would allow them to continue to raise and teach their children in whatever way was/is best suited to their children's specific needs, rather than having to rigidly follow a curriculum that was directly contributing to their child's (or children's) struggles and trauma within the school system. Social concerns are only part of why such families choose to take their children out of educational institutions. However, what's been interesting about getting to spend so much time around families such as those described above is the way in which it's also helped us become even more aware of the ways in which our own children are not entirely dissimilar. While not neurodiverse in any meaningful way, our children clearly benefit immensely from the kind of fluidity afforded us in terms of our educational approach throughout each year. The rigidity of something like the Australian National Curriculum runs counter to that fluidity.

The other major concern I have with the proposed changes included in the bill relates to the way in which reporting will be handled. This concern is twofold, insofar as there seem to be two distinct ways in which the bill proposes to revise the current reporting process. In the first of these proposed revisions, the parent in charge of compiling the end-of-year write-up would be expected to report (presumably with two work samples per subject, though this is not explicitly stated in the bill) on every

subject rather than just English, Mathematics and one other subject per year. In the second of the two proposed revisions to the reporting process, there seems to be a suggestion that additional progress checks would be carried out (presumably by the Home Education Unit or someone deputised by the Home Education Unit, though this is not explicitly stated in the bill). Addressing the first of these revisions, I would first like to state that I believe that asking the reporting parent to provide a detailed write-up (with supporting samples) on every subject will be untenable at best, not only for the parents compiling these reports but for the Home Education Unit, who already face an incredibly complex task in assessing the reports that parents are expected to submit under the current requirements. For the parents themselves, this would certainly result in a much larger workload leading up to their individual reporting deadlines. While there is absolutely an argument to be made for holding educators (parents or otherwise) accountable for the work that they do, it is also important to remember that a delicate balance needs to be struck between a) putting measures into place in service of that accountability and b) ensuring that those measures are not so extreme as to make it all but impossible for the person being held accountable to actually do the work for which they are being held accountable. I believe that the current requirements do an excellent job of striking this balance, not just in terms of my own experience with them but in terms of my interactions with fellow parents and their children, all of whom interact with these current requirements in their own distinct ways—the balance between accountability and freedom/flexibility is incredibly important, and I am concerned that increasing the level of required reporting will have a chilling effect on many families' currently thriving educational routines and will discourage many other families from ever choosing to home educate in the first place, even where such a path would clearly be to the benefit of their child or children. From our own personal experience, I can say that there are years during which one or the other of our children begins the year by showing a great deal of interest in a particular subject, only to have their natural enthusiasm lead them to focus most of their attention somewhere else entirely. There have certainly been years at the end of which one or the other of our children hadn't really focused all that much on a given subject at all, save for casual reading, conversations, some trips to museums, etc. It is hard to imagine such ambient but nevertheless meaningful education being translated into the kind of quantifiable terms that are expected in the annual report. However, the simple act of having to write the annual report as it currently exists is more than enough of a prompt for my wife and I, year on year, to check in with each other as to what areas need to be given more focus in the following year. The real value of this kind of natural back-and-forth—punctuated by an annual nudge to self-assess—is the way in which it leaves room for our children to benefit from what makes home education profoundly distinct from conventional schooling. As to the second proposed revision, what concerns me most is that it seems

fundamentally incompatible with the first proposed revision, at least in the absence of any clear language regarding what implementation of either one of these revisions might actually look like. If parents are going to be asked to essentially write end-of-year reports that are nearly 66% longer than at present (i.e. detailed annual reporting on eight subjects rather than three), the additional burden of needing to prepare for vaguely defined periodic checks throughout the year seems completely unrealistic. To be entirely honest, I would expect a *reduction* in the annual reporting load even from its *current* benchmark if such periodic checks were implemented as a regular requirement of registered home education. If such a concession was made—if the annual reporting requirements could be reduced in light of periodic checks throughout the year—I would, in fact, be quite in favour of a change such as this second proposed introduction of increased reporting checks throughout the year. But what concerns me most about the bill actually being considered by the committee is the lack of specificity regarding either one of these amendments. In the absence of clearer language, I strongly oppose both.

Finally, in terms of outright concerns, I would like to briefly address the proposed move away from certificates to what sound like far more detailed notices. While I can understand that the introduction of such a change may in fact be motivated by a desire to simplify the lives of home educating parents by providing increased transparency between the Home Education Unit and Centrelink, I personally feel that such a change would be ill advised at a historical moment in which threats to data security and privacy have arguably never been higher. Speaking from personal experience, the instances in which my wife and I have had to liaise with Centrelink concerning issues related to home education have been perfectly manageable—in the absence of clearer explanation regarding this proposed amendment, I feel quite strongly that it may do more harm than good.

While I actually agree with some of the underlying principles, such as the focus on verifying the safety and wellbeing of children who are being home educated, I do not believe that the changes proposed in the amendment bill are the right ones to address these underlying principles. In the case of safety and wellbeing verification, I am concerned that not enough thought has gone into what implementation of such an amendment might actually look like. At the beginning of this letter, I used the term ‘second generation’ to refer to myself. This is a phrase that my wife and I often use to describe ourselves and others like us—people who were themselves home educated and have made the decision in adulthood to home educate our own children. I am originally from the United States and was home educated in Pennsylvania, where one of the annual requirements for home educating families was to have a licensed evaluator visit and affirm that learning was indeed taking place and that the home was

a safe environment. Some of these evaluators were teachers, some were themselves home educating parents whose children had grown up and started their adult lives. Families were free to find an evaluator of their own choosing and arrange their own annual visit themselves (much the way one might seek out a justice of the peace to have a document verified), so that a healthy level of comfort developed over the years—as I remember them, these annual visits were always quite pleasant, a chance to show off whatever we were excited about at the time and to catch up briefly with a familiar face. The lack of anything so specific (even if only in terms of *proposed* methods for implementation) in the 2024 amendment bill is what concerns me most. A vague amendment seems too much like *carte blanche* for whoever might choose to exploit it to whatever end.

Apologies for what I realise are some incredibly dense paragraphs. In my opinion, the proposed amendments leave far too much up to subjective interpretation and it felt important to me to articulate some of that interpretation and its possible flow-on effects (as well as suggested improvements) in as much detail as I wished I saw in the bill itself. I also sincerely hope that the committee understands that increasing the administrative burden on home educating parents will inevitably impact the decision making process for future families who might be considering home education from *before* their children even enter the educational system. If the administrative bar seems impossibly high, such families will simply never register their children with the Home Education Unit in the first place. My wife and I already know plenty of families who have chosen not to register their children. Indeed, as second generation home educators who always knew that we would home educate, registering our children was a choice we consciously made, knowing that we had the luxury of never entering the system if we didn't want to. However, it was (and is) important to us to be registered, to contribute to a visible, documented community of families who choose to educate our children ourselves. I would hate to see new requirements that disenfranchised even more families than already feel as if they have no choice but to opt out. The goal should be to create a system of regulations that meets the actual needs of everyone impacted, children and parents alike.

Thank you for taking the time to consider my feedback.

Sincerely,

David Thomas