

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

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# Response to the Consultation Paper – Home Education

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## Application Process

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Would a shift to one application process provide a more streamlined experience for parents?

The shift in the application process will not provide a more streamlined approach for parents. As Queensland does not currently have an official state home education association, new parents rely heavily on experienced home educators volunteering their time to guide them through the application process. I have personally assisted numerous families in understanding, writing and submitting their applications, all on a voluntary basis in my own spare time. Having provisional registration allows me to assist more families and manage my time efficiently. When a family is removing a child from school due to safety concerns, the application process for home education needs to be quick and simple. I think there should be a two-stage application with a provisional application followed by a more thorough application with the summary of educational program. I think this because I am concerned that the removal of provisional registration may prevent some parents from applying as they won't have a staggered entry point and volunteers will not have the capacity to assist with full registration immediately.

Should subsequent applications in a 12-month period be accompanied by reporting about education in the previous registration period (if no report was provided in that period)?

In my experience, when families chop and change between attending school, distance education, tertiary education and the HEU, it is usually due to them seeking the best educational experience for their child. It can also be due to traumatic family situations for example, grief, domestic violence, homelessness, job instability or natural disaster. In these cases, extra support from a panel of experienced home educators working alongside the Department would be most effective in keeping these families engaged. Over-reporting risks disengagement and non-compliance.

Are the time periods proposed reasonable for applicants and decision-makers?

Does the proposed process adequately cater for unforeseen circumstances?

30 days is reasonable if the HEU provides more support to new families in writing a plan. 45 days would allow for a higher quality plan and takes into consideration the current heavy reliance on volunteers to support new homeschooling families.

No, especially if the application process is changed to remove the option for provisional application. I am concerned that children in vulnerable situations due to bullying, natural disaster or domestic violence may be at risk if the time periods are too short.

## Meaning of high-quality in the context of home education

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Would a definition for a high-quality educational program be beneficial to demonstrating compliance for registration purposes?

Yes, but only if it applies to meeting the individual child's specific needs and absolutely not tied to any curriculum.

In my thirteen years home educating I have relied on the guidelines for defining a high-quality education given by the HEU; is responsive to the child's changing needs as indicated by short and long-term goals and social development, has regard to their age, ability, aptitude and abilities, is conducted in an environment conducive to learning, utilises relevant and suitable teaching strategies, engages the child in a range of rich and varied learning experiences and is supported by sufficient and appropriate resources. I found this to be extremely helpful when curating a high-quality education for each of my five children.

I also do not believe ACARA or any other fixed curriculum can fit this definition of a high-quality education. For our family, and most other home educating families I know, we can provide a high-quality education or we can follow ACARA, not both. I am very concerned that if the definition of high-quality education in our legislation is changed to be synonymous with a standardised curriculum, this will cause disengagement, non-compliance and misreporting from families.

Do you support the suggested aspects of the definition? If not, why?

Absolutely not. As noted above, if legislation defines high-quality education as being linked to a standardised curriculum and not as being tailored to the specific child in question, their individual needs, goals and culture, I believe more families will choose non-compliance and disengagement. I will always choose to prioritise individualised, high-quality education for my children over following a standardised curriculum. Our ten-year-old is currently learning about quantum mechanics, propellants and aerospace fluids and is already creating a portfolio of his experiment findings and prototypes for university entry. If registration legislation was aligned to ACARA, I could demonstrate compliance by evidencing his understanding of the following: Year 5 Earth and Space Sciences, The Earth is part of a system of planets orbiting around a star (the sun) ([ACSSU078 - Scootle](#)) I find this so problematic as although I would be compliant, it would not be providing a high-quality education, following ACARA in this case would be tantamount to educational neglect in my opinion.

If the department's priority is for children to receive a high-quality education and for parents to remain engaged and compliant with legislation, aligning with standardised curriculum is not the answer.

Very rarely, I have seen home education used as a cover for child abuse and neglect. This is abhorrent to me and I will support changes that protect these children, however, aligning to ACARA will potentially make loopholes easier for these abusers to exploit. It is much harder to falsify a truly individualised educational plan than it is to create one aligned to ACARA. Especially with the rise of Artificial Intelligence technologies, standardised educational plans

will be easier to create, causing potential misrepresentation between what is submitted to the Department and what is really being delivered to the child. We want to be able to showcase the amazing things we are doing, we are proud of our children and the life we live, arbitrary box-ticking will hold us back.

Are there other aspects that need to be considered to support home education philosophies?

Home education is not like school. It is as similar as a home-made meal made from home-grown vegetables is to a MacDonalds Big Mac meal. Procedures that work for one are totally incompatible with the other. A panel of experienced home educators working alongside the department would be a valuable resource for all involved.

Over thirteen years, I have found quality resources that support learning in our family. These are not all aligned with ACARA, and yet work well for us. It would waste precious time to cross-reference these resources with curriculum outcomes.

## Reporting on educational progress

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Do you support the requirement to report on educational progress of the child being removed from the legislation? If not, why?

I support reports on educational progress, rather than a focus on the learning plan because the former is child-centric whilst the latter is simply box-ticking of parental compliance with a plan. The ability we have as home educators to be dynamic, practicing pedagogical pivoting, creativity and flexibility in supporting an emergent curriculum is the most powerful tool we use.

What aspects of reporting on implementation of the educational program do you think would facilitate decision-making, e.g. a description of the high-quality learning activities undertaken by the child; samples of work in literacy and numeracy; specific work samples across curriculum learning areas?

I wish to see more freedom in the way I report and I don't believe two annotated work samples are the best method. I would like to report by subject, unit of work, or goal using learning stories, photos, diary entries and/or completed timetables and curriculum as proof. I would add work samples and descriptions to demonstrate a high-quality education. HEU could undertake training in homeschool philosophies if they are unable to easily assess learning in the home education context.

Further, the use of the KLAs to indicate learning activities is problematic. We use a project based approach that incorporates multiple KLAs into each learning activity. I find breaking up our explorations into subject areas unnecessary and does not reflect the complexity of our learning. As such, the current reporting system does not sufficiently allow for the richness of experiences to be adequately reported.

## Streamlining review of written reports

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Would you support the sample assessment approach to annual reports for home education registration?

I would support this approach as long as:

1. Parents are notified in advance that their sample will be audited in the reporting cycle
2. Parents do not have to submit a full report each cycle if they are not being audited.

Expecting parents to submit a report, when it will not be fully reviewed, is likely to lead to non-compliance with regulatory requirements as it takes away our precious time that could be better spent educating our children.

On what basis do you think sampling could be undertaken, and what would an appropriate sample be?

Sampling could be random, should be representative of a percentage of the population that will provide data adequacy which is determined by what the regulator aims to achieve with the sample.

Would it be appropriate for all reports to be assessed in the first year of registration?

Yes, if adequate professional development type activities were provided if the report was found to be lacking.

I would suggest a panel of home educators to assist with this process, as they would be able to provide advice based in experience and would speak the language of parents.

## Removing requirements to issue a certificate of registration

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Do you support removing the requirement for issuing a Certificate of Registration?

No, we rely on these for entry to locations to validate our children's status as 'student'.

Is there anything you use the Certificate of Registration for that would not be addressed through provision of a written notice of the registration decision?  
We regularly need to show the certificate for tertiary education, employers, resource providers and non-profit organisations. They often do not accept a written notice.

## Changing calculation of time periods for internal review decisions

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Are there any unidentified risks associated with a shift to calculating the timeframes for internal review decisions on a calendar day basis?

If there is an agreement to the 365 days a year of learning then there must be acceptance of that across all areas of homeschooling. Including but not limited to including weekend lessons as part of our curriculum along with reporting requirements

Should existing timelines for internal reviews be retained if this occurs? If not, what changes might be required?

Existing timelines should be retained.

## Expanding grounds for cancelling registration

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Does inclusion of these additional grounds for cancellation of home education registration appropriately align with the home education registration requirements?

If the definition for homeschooling was included in the scope of this discussion and altered to remove location-based learning, I would happily agree to these conditions for cancellation. I request that the definition of homeschooling is included in the scope for review. I propose the following definition: Home schooling is "A form of private education where parents take full responsibility for the child's learning needs."

It is absolutely essential for our family, and most home educating families I know, that a large portion of our educational experiences occur outside the physical location of the home. Field trips, collaborative group projects, work experience, volunteer work, workshops, classes, travel, sports, clubs etc are vital components to the rich learning experience experiences our children enjoy. Risking cancellation based on participation in these activities would equate to social, emotional and educational neglect in my opinion.

In addition, instruction outside the home/school (such as AMEB, private colleges and TAFE qualifications) may be used to further the student's case for access to higher education and is widely accessed by the majority of students who do not rely on an ATAR pathway into higher education. This proposal seems to hold the home educating at a higher standard than schooling families.

Are there any other grounds for cancellation that should be considered?

No.