

SUBMISSION TO EDUCATION AND INNOVATION COMMITTEE

RESPONSE TO EDUCATION LEGISLATION AMENDMENT BILL 2013

A Bill for an Act to amend the Child Care act 2002, Education (Accreditation of Non-State Schools) Act 2001, Education (General Provisions) Act 2006 and the Education (Queensland Studies Authority) Act 2002

Background

Independent Schools Queensland (ISQ) is the peak representative body for the independent schooling sector in Queensland. ISQ membership comprises 187 independent schools operating on some 200 campuses throughout the state. These schools are educating over 115,000 students in 2013, or approximately 15% of all Queensland students. Further, independent schools educate nearly 20% of all Queensland secondary students. The majority of independent schools are Prep to Year 12 schools. Independent schools are autonomous schools governed at the local level. Each school's governing body is responsible for the educational programs offered by the school and the delivery of those programs.

The Department of Education, Training and Employment has consulted with Independent Schools Queensland (ISQ) on those provisions of the Bill impacting on independent schools. In particular, ISQ is pleased to see inclusion in the Bill of issues raised with the Department during the consultations with respect to "simplifying the red tape" in relation to the transition of Year 7 as an attribute of Primary education, to being an attribute of Secondary education. The Bill prescribes a simple requirement for schools currently offering Year 7 in a P-12 setting, or those currently offering Years 8-12, to amend their attributes of accreditation to move Year 7 from primary to secondary, through the lodgment of a Year 7 change notice [Sec 240(2) and (3)] to the Non-State Schools Accreditation Board (NSSAB).

The Year 7 change notice must be given in writing to the regulatory body (NSSAB) in the prescribed (yet to be determined) format. ISQ will be happy to work with NSSAB to ensure the prescribed form (including pre-populating of school details) is appropriate and easily able to be completed by schools. As this requirement results from a Government policy change to transfer Year 7 from Primary to Secondary education, there should be no need for excessive paperwork in terms of a school's attributes being recorded on the accreditation register.

Given that 130 independent schools are already offering P-12 education and a further 12 are offering a Year 8-12 education, ISQ welcomes a simple process to formalise the accreditation requirements. Further, given that the Commonwealth Government already recognises Year 7 as being an attribute of Secondary education in a number of Australian States and Territories, ISQ also looks forward to a speedy and simple process between NSSAB and the Commonwealth Government to update records and adjust grant payments so that independent can continue to focus on the important task of providing high quality education.

For the 35 independent schools offering primary only education at this stage, Division 3 sets out the process by which they must comply should they wish to retain Year 7 as an attribute. Some of these 35 schools have already commenced the process of seeking approval to extend their

educational offering to include Year 7 as a Secondary education component. ISQ understands that there are procedural requirements that NSSAB must comply with, however, the need to undertake the full application process in respect of these schools is questioned. Given these schools already have accreditation with NSSAB, ISQ would recommend that consideration be given to a simplified accreditation process.

An example would be in the fact that these schools currently offering Year 7 are required by legislation to have positive exemption notices for their directors as part of their accreditation requirements. This particular requirement in relation to the transfer attribute of Year 7 appears to duplicate existing provisions and requirements. In the spirit of the Queensland Government's desire to reduce red tape, ISQ recommends this duplication be excluded from the procedural requirements under this section.

ISQ supports the provision and intent of the Bill in terms of prescribing a clear simple procedural pathway for independent schools to comply with the regulatory requirements of NSSAB. This will ensure that schools receive appropriate funding levels reflecting the change of accreditation status of Year 7 from the commencement of the 2015 academic year.

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