



	Policy Area	Potential Issues	Notes
1	Recurrent Funding	2009-2012 <ul style="list-style-type: none"> • quadrennial funding, • indexation 	
		2013 and beyond <ul style="list-style-type: none"> • quadrennial funding • The implication of the “schooling” terminology in which the divide between Government and Non Government sectors may be reduced or eliminated • The implications of the SES rating of Government schools • The future of AGSRC • The removal of the safety net • The shape of the SES funding curve • The application of SPPs • The application of NPPs • The link between the Governments reform agenda, implementation costs and recurrent funding loadings • The implications of the progressive devolution of education to the States 	<ul style="list-style-type: none"> • A forward commitment to 4 year funding is required • Watching brief • Watching brief. At this stage there is nothing to fear from this proposed process. • Though interested in the information that other indices may reveal, AACCS believes that it is important for the comparison between Government and Non Government schools costs (i.e AGSRC) to be maintained as the primary basis of indexation on the condition that it be fully costed and fully transparent. • Though the removal of “funding maintained” category as a safety net is necessary at some stage, AACCS believes that, whatever comes out of the funding review, it should be our aim to achieve a soft landing for the funding maintained schools, (eg funding guarantee) or a 25% pa adjustment to SES over a four year period. It’s almost accepted that the funding level will go. • It should be our aim to minimise the number of schools that suffer loss in the transition from the present arrangements to the new funding regime (assuming an SES based model continues) • Watch and see how projects are funded and made accountable as the new SPP regime is implemented • Watch and see how projects are funded and made accountable as the new NPP regime is implemented • AACCS would be favourably disposed to the concept of loadings automatically applied to basic recurrent funding levels to cover for various categories of disadvantage e.g the remote and regional supplement • Watching brief

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2	Targeted Programs	<p>2009-2012 Few if any changes to the current arrangements for Non Government schools</p> <p>2013 and beyond</p> <ul style="list-style-type: none"> The outcome of the interplay between SPPs and NPPs for both the Government and Non Government sectors. The implications of greater state autonomy beyond 2012 The progress of the reform agenda for social inclusion and disadvantaged communities Indexation 	<p>No changes</p> <ul style="list-style-type: none"> AACS supports the use of SPPs and the NPPs for the funding of various forms of targeted and supplementary funding provided that the mechanisms by which the funding is applied are completely comparable between the sectors and equitable for each category and degree of disadvantage. AACS would echo the position taken by ISCA and NCEC re the funding agency in each state being at arms length from both the Department of Education and the Catholic and Independent schools AACS believes strongly that the current indices of disadvantage ignore substantial data sets that are the source of some of the most significant links to educational disadvantage. We believe that there is a need to broaden the definitions of disadvantaged to pick up communities that currently fall through the net – e.g behavioural, social-emotional, mental health, family dysfunction, criminality AACS believes that the AGSRC is still the best index to ensure the comparability of funding between the sectors
3	Students with Disabilities	<ul style="list-style-type: none"> The absence of any specific commitment from the Government to the funding of this area of disadvantage. The credibility of the Government's commitment to disadvantage and social inclusion The potential for NPPs to be used to resolve the hiatus in this area. The overwhelming consistency of the outcry from both Government and Non Government school peak bodies. 	<ul style="list-style-type: none"> AACS considers the absence of definitive policy and financial commitment in this area to be a matter of discrimination against students with disabilities in the non government schools sector. There is a need for an urgent and substantial commitment from the Government for a temporary transitional allocation of funds to this area of need while a more substantive and comprehensive solution is modelled and implemented following the collation and analysis of national data sets. AACS believes there is a real problem of credibility in terms of the Government's rhetoric on the issues of social inclusion and disability given the fact that there is no new commitment of funds on the table for large populations of disabled and disadvantaged children in the non government sector Watching brief. AACS is interested in the possibility of a long term solution to the funding of students with disabilities in non government schools being caught up within a more comprehensive reform program within an NP encompassing Early Childhood (i.e. Early Intervention) Disability, Social Inclusion (i.e. Family Dysfunction) and Health (including Mental Health) AACS is very supportive of the approach of cross-departmental solutions to the funding of students with disabilities in non government schools. However, the need for supplementary funding in this area is urgent and should not be deferred while the Government is finding a big picture solution. There is a need for urgent interim funding until the ultimate solution is put forward.

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4	Indigenous Education	<ul style="list-style-type: none"> The future of the Northern Territory Emergency Response The widening of the response to all Indigenous Australians. (See appendix 1 - The Governments "Closing the Gap" agenda page 15-19) The funding mechanisms and the equity of access to all groups and systems involved in Indigenous Education 	<ul style="list-style-type: none"> Watching brief. AACS is concerned that the Government has not initiated substantial partnerships with NTCSA who already has very well established constructive and respected relationships with a number of communities in which the NTER is being pursued. AACS supports in principle the <i>Closing The Gap</i> agenda on the understanding that indigenous communities Australia-wide need and deserve the support anticipated in this policy. NTCSA is a good model for evidence-based success in indigenous education settings. Watching brief. AACS is concerned that the Government has not initiated substantial partnerships with NTCSA who already has very well established constructive and respected relationships with a number of communities in which the NTER is being pursued
5	Capital Grants	<p>2009 – 2012</p> <ul style="list-style-type: none"> Few if any changes expected to current practices and policies <p>2013 and beyond</p> <ul style="list-style-type: none"> The outcome of the interplay between SPPs and NPPs for both the Government and Non Government sectors. The implications of greater state autonomy beyond 2012 Indexation 	<ul style="list-style-type: none"> Watching brief. The quantum of capital funds should continue to grow to reflect <ul style="list-style-type: none"> the number of schools the changing nature of education the upgrading of resources while the Government undertakes its review of the funding of Non Government schools Across all states there should be an even playing field in relation to interest subsidies, low interest loans or equivalent. <ul style="list-style-type: none"> Is it worth exploring greater accessibility to low interest loans? It should reflect the Building Price Index We think there is a place for period supplementation of the nature of IIOSP investing in our schools Watching brief The pool of funds available should be increased according to <ul style="list-style-type: none"> the number of schools the changing nature of education the upgrading of resources and indexed annually according to the Building Price Index
6	Sex Discrimination Act	<ul style="list-style-type: none"> Mounting pressure from outspoken secularists and political minorities pushing political correctness agenda and affirmative action. However, no change expected from either Government or opposition to their current stance. 	<ul style="list-style-type: none"> AACS affirms the current policy position and will keep it high on the agenda

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7	Accountability	<ul style="list-style-type: none"> • Shift from inputs to outputs • Strong emphasis on data collection and analysis • Government commitment to transparency • The reported increasing failure rate of schools • The risk profiling of schools • Census audits • Governance reviews • Financial Performance Ratios • The expansion of the Financial Questionnaire to include "leading indicators" of risk • The impact of the National Education Agreement • The public reporting on National testing results 	<ul style="list-style-type: none"> • AACS affirms this approach provided that it does not unnecessarily ramp up the amount of work involved in compliance. • AACS affirms the establishment of the National Data Centre provided that the data collected is genuinely relevant and applied responsibly. Watching brief on the nature of data sets, rationale for its collection, analysis and application. • AACS is concerned that a commitment to transparency does not have the affect of condemning the disadvantaged via media access to the data centre and manipulation of the data for its own agendas. There is also a significant difficulty in ensuring that the comparison between <i>like schools</i> is well founded in data that is much more substantive than the crude measure of SES. It would appear that there will be some difficulty in gathering reliable data on some sociological categories that are significant measures of disadvantage and need. • AACS believes that there is a need to ensure that the publication of schools data does not have the effect of condemning parents, schools and communities. • AACS is cautiously welcoming of the concept subject to thorough consultations following the release of the proposal. • AACS is supportive of the auditing of schools, provided that schools are resourced to meet additional compliance requirements. This particularly applies for small schools. There is also a need to ensure that small schools are not unfairly targeted under these measures. • AACS is supportive of a responsible checklist of Governance requirements for schools provided that it is not unreasonably onerous and reasonably accessible for non expert Board Members. • AACS is supportive of a standard list of relevant performance ratios for schools. • AACS believes that the financial questionnaire is the appropriate mechanism for the collection of additional performance data provided that that list of new data is the subject of thorough consultation and is readily accessible from standard data collected and reported on by schools. Benchmarks for these performance ratios ought also to be the subject of thorough consultation. • Watching brief • AACS has no objection to the publication of individual and school results to the schools but has significant concerns about the potential for the data to be used unscrupulously in the hands of the media. AACS also believes that there are no problems with the Minister collecting the data for the purposes of analysis and application of funds to the most needy schools, however this data should be heavily scaffolded with confidentiality protocols.
8	Faith Based Schools	<ul style="list-style-type: none"> • No obvious concerns evident at this stage in either Government or Opposition policy positions towards Faith-Based Schools. There is, however, mounting pressure from outspoken secularists and political minorities (Greens) against religion being taught in any schools. • The near closure of Lakeside and the Western Australian Islamic Schools indicates a need for greater vigilance. The financial collapse of a number of religious Non-Government schools raises the spectre of the 'risk-profiling' of all schools by the Federal Government 	<ul style="list-style-type: none"> • AACS believes that there is a need to make better use of its 'worldview' perspective on education, especially in the current political and educational climate which is increasingly secularist in tone. AACS needs to make sure that its position is put forward at every opportunity to ensure that comparisons between secular and faith based schools are conducted in an even-handed way. • In the light of these closures, AACS is firmly committed to best practice and ethical conduct in all its schools and, to that end, is supportive of additional Government scrutiny as outlined under the issue of Accountability noted above. AACS expects close consultation with DEEWR in the development of any 'risk profiling' definitions, policies and procedures.

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9	Remote and Regional Supplementation	<ul style="list-style-type: none"> • Few if any changes expected to current practices and policies • The relatively narrow band of schools included in the FACSIA index of isolation 	<ul style="list-style-type: none"> • Watching brief. • AACS believes that there are grounds for the ARIA index to be reviewed and critiqued with a view to including a significantly larger number of regional and remote schools that carry the burden of isolation costs.
10	National Curriculum	<ul style="list-style-type: none"> • An “imbedded curriculum” i.e National Goals imbedded in existing State curricula versus a genuinely new National Curriculum • The extent of the content (ie volume) • The specific nature of the content ie Awareness of the Social Reform Agenda of political minorities • The level of prescription i.e space for local school based content • Capacity of the school to interpret and integrate the compulsory curriculum • The likely cross-curriculum issues and agendas • The accountability of the National Curriculum Board • The audience for the National Curriculum 	<ul style="list-style-type: none"> • AACS is broadly supportive of the genuinely national option subject to qualifications outlined below. • AACS believes that the National Content should not be too consuming in terms of the overall volume of material to be covered by schools. • AACS is concerned that the content of the National Curriculum not be subject to manipulation by minorities pushing a heavy agenda of political correctness and social engineering. • AACS believes that adequate space must be left for local school-based content and that schools must be free to interpret the curriculum within the context of their particular world view, • AACS believes that schools must be free to integrate the compulsory components of the curriculum within school based curricula where their philosophy and pedagogy are significant in their distinctiveness as a school. • Watching brief. • AACS is concerned that the point of accountability for the National Curriculum Board is not completely clear. AACS is concerned that the Universities not be given prominence in determining the content, pedagogy and assessment components of the National Curriculum but rather that qualified and experienced practitioners from all sectors and jurisdictions be given the opportunity for input and that the process include thorough consultations. • AACS believes that the National Curriculum should be primarily directed as practitioners. However, in the process of achieving the final outcomes, the concerns and interests of parents and peak bodies should be thoroughly canvassed.
11	Trades Training Centres	<ul style="list-style-type: none"> • The criteria for successful applications • The preference for consortia • The high costs to schools over and above the capital grants on offer 	<ul style="list-style-type: none"> • AACS notes that the Government is taking a very literal interpretation of the criteria for this program in the first round. A watching brief should be kept on the application of these criteria in future rounds and, if necessary, make representation for greater flexibility in the rollout of the program. • AACS notes that while economies of scale and a wider selection of trades courses may well be achieved through consortia, the school with the facilities will clearly benefit in terms of enrolments and public perceptions. With this in mind a watching brief must be kept on this program to ensure that the non government school sector is not disadvantaged by the location of consortia facilities. • While broadly supportive of the program and the goals that the Government is seeking to address through this program, AACS notes that the on-costs and recurrent costs associated with this program are potentially very high indeed and that further funding may be needed to sustain the initiative over the longer term.

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	Policy Area	Potential Issues	Notes
12	Early Childhood and Healthy Kids Check	<p>Early Childhood</p> <ul style="list-style-type: none"> • The economic motivation for Early Childhood Education. • The importance of the early years for bonding between children and their parents • Early diagnosis and intervention • Early acquisition of basic skills for life and learning • The link between health and early childhood development • Quality childcare and preschool education • The co location of Early Childhood facilities and schools in both Government and Non Government school settings • Common registration of Early Childhood education centres and schools • Funding • The Australian Early Development Index • Access to graduates from the Early Childhood Training Initiative 	<ul style="list-style-type: none"> • AACS notes strong economic and productivity motivations of the Government in its Early Childhood initiatives, but is broadly supportive of the principles of choice, flexibility and the rights of parents. • AACS notes the importance of the early years of childhood as a context for bonding between children and their parents and is supportive of any initiatives to enable parents to maximise the time spent away from work for this purpose. • We affirm the government's policy direction to boost the participation of parents in the learning and development of their children and would encourage any initiatives to assist and equip parents for this task. • AACS is supportive of any initiative that enables the early diagnosis and intervention for disabilities and learning difficulties and believes they should be applied on an individual basis and not just to schools with aggregations of such children. • AACS is supportive of the allocation of additional resources to ensure that basic skills and knowledge are acquired and consolidated in the early years of schooling. • AACS notes the strong links between health indicators and the developmental benchmarks of Early Childhood. In this connection AACS is supportive of the Healthy Kids Check on the understanding that resources will be allocated on an individual basis to address any deficits rather than to schools with aggregations of such children. • AACS is supportive of the Governments initiative to increase the supply of well qualified preschool teachers and aides. • AACS believes that there should be opportunity for Christian schools to bid for the placement of Early Childhood Centres on the sites of existing Christian schools. • AACS believes that where Early Childhood Centres and schools are co-located, the opportunity for the development of common policy, procedure, programming and shared services should be facilitated through a common registration authority for both the ECCs and the schools. • AACS is supportive of the additional funding for childcare places and for the fifteen hours of Early Childhood education in the year before the commencement of school. • Watching brief • AACS believes that Christian schools should be able to access graduates through Christian Higher Education providers under the terms of the Governments new initiative to provide more trained Early Childhood teachers. • NOTE: AACS believes strongly that the pay scales for Early Childhood teachers and qualified childcare workers working in Early Childhood Centres need to be addressed in the funding framework if quality candidates are going to be attracted to this program.

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13	Family/School Partnerships	<ul style="list-style-type: none"> Maintaining and integrating an effective voice for parents in the learning and development of their children The role of the Family, School and Community Partnership Bureau 	<ul style="list-style-type: none"> AACS believes very strongly that there must be effective opportunities for parents to be consulted regarding the major policy initiatives of Government and is very supportive of the recent initiative to establish the Family, School and Community Partnership Bureau. Watching brief
14	Tax Deductible Education Expenses	<ul style="list-style-type: none"> Universal access for all families to each item of expenditure and the scope of eligible expenses Evidence requirements for eligible deductions and the administrative complications and demands in identifying eligible expenses on school invoices, including the receipting of small regular amounts for eligible items Fees 	<ul style="list-style-type: none"> AACS acknowledges that for the program to be equitable for the families of all school aged children, the list of deductible items must be equally accessible to all. AACS warmly supports the initiative but believes that there are opportunities for a substantial expansion of the list of deductible items and the maximum deductible value for each family. AACS notes the complexity that may be involved for schools in providing families with the required evidence to be able to access tax deductions under this program. Significant consultation is required between peak bodies and the taxation office to minimise the impact of this program on school administration staff. AACS still believes that a tax effective way for the Government to subsidise the operation costs of non government schools is to provide tax deductibility for fees to a maximum threshold. NOTE: Follow up with the Management & Finance Committee of CEN
15	Environmental Incentives	<ul style="list-style-type: none"> Solar Schools Project <ul style="list-style-type: none"> Wider environmental policies The capacity for schools to generate income from excess supply Water collection capacity and use 	<ul style="list-style-type: none"> AACS is warmly supportive of this initiative and believes that there are ample reasons to increase the funding for this initiative to increase the generation of non polluting power, to reduce the demand on the grid, to maximise the collection of water and to stimulate innovation in environmentally sensitive programs.
16	Compliance Costs See Accountability above		
17	Copyright	<ul style="list-style-type: none"> Few if any changes to the current arrangements for Non Government schools The rapid expansion of copyright issues attached to untraceable technologies 	<ul style="list-style-type: none"> AACS supports the payment of a nominal per capita fee to agencies which should be calculated on an agreed formula on the understanding that all schools should be exempt from prosecution in return for the payment of the fee. AACS believes that extensive negotiation must be undertaken between the Government, schools and copyright owners in reaching the agreed formula. The formula should be subject to periodic review by agreement. AACS believes that this issue should be taken into account in the abovementioned negotiations and that all anticipated technologies and media should be incorporated into the formula.

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18	AGSRC See also Recurrent Funding Review above	<ul style="list-style-type: none"> • The future of AGSRC in a National “Schooling” Environment • Other related issues <ul style="list-style-type: none"> ○ Other approaches to indexation ○ The implications of Commonwealth State Agreements ○ The implications of the new data collection protocols ○ Common approaches to measurement and accounting across all jurisdictions ○ Transparency of data and the calculation of the AGSRC of the Productivity Commissions Average Cost of Schooling 	<ul style="list-style-type: none"> • While AACS believes that the AGSRC is still the most useful basis for comparison and indexation of funding to non government schools, the impost of the time lag between the costs being incurred and the indexation being applied to non government schools is a significant concern that must be addressed during the federal government review of school funding. • While other indexes of disadvantage may be useful to cross check the efficacy of the AGSRC as a basis for comparison between Government and Non Government schools, AACS believes that a truly equitable funding arrangement will need to take into account the outcomes of the Commonwealth-State Agreement, new data available from the National Data Centre, common measures and accounting protocols and a fully transparent and inclusive costing of the AGSRC.
19	Performance based pay	<ul style="list-style-type: none"> • The primary motivations behind rewarding quality teaching • Managing the administration of performance based pay (cf the outcome of the concept of advanced skills teachers becoming an automatic top of the scale increment) • Controlling the drift of performance rewarded teachers into high fee schools • Rewards and responsibilities in a framework of performance based pay 	<ul style="list-style-type: none"> • AACS is very much aware of the many motivations behind the concept of rewarding quality teaching but is concerned that some of these motivations are ill-considered and may have considerably significant negative consequences if they are not scaffolded with the appropriate Government policy and funding. • AACS is aware of the tendency for performance increments to become unofficial and automatic steps integrated into the pay scale. Eg AST1. For performance increments to be effective in building quality practice and a professional culture, the criteria need to be objectively defined and assessed and outside of the influence of the Unions and the award environment. • AACS is concerned that performance credentialed teachers in low fee schools may have the potential to be recruited and rewarded at rates above the capacity of low fee schools by high fee schools. For this potential to be minimised, Government funding would have to be made available to enable schools to protect their investment in developing and rewarding quality teachers. AACS believes that, if the Government determines to legislate performance pay for quality teaching, the Government should provide significant financial input to make it work equitably across all sectors. • AACS supports the concept of formal recognition of master teachers with the consequential allocation of responsibilities and pay to be matters decided at the school's base level.

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20	Data Collection, use and publication See also Accountability and Compliance Costs above	<ul style="list-style-type: none"> The role of the data collection centre The implications of the new data collection protocols Common approaches to measurement and accounting across all jurisdictions Transparency of data Increasing the scope of measures of disadvantage Alternative indexes of disadvantage to SES (eg Tony Vincent) Agreements on key performance measures for schools The de identification of data before publication Confidentiality protocols 	<ul style="list-style-type: none"> AACS affirms the establishment of the National Data Centre provided that the data collected is genuinely relevant and applied responsibly. Watching brief on the nature of data sets, rationale for its collection, analysis and application. AACS is concerned that the data collection protocols do not increase the administrative burden on schools to collect and record data unless it is critical to the establishment of agreed standards and takes place in full consultation with all sectors and peak bodies. AACS believes strongly that all Government jurisdictions should be required to adopt identical approaches and definitions to data collected from schools and identical accounting practices that would ensure a more transparent AGSRC and other financial data. Refer 7 above AACS is concerned that the current data sets used as measures of disadvantage are not adequate to identify need and to allocate resources differentially to address educational disadvantage. AACS is supportive of a careful examination of data sets of family dysfunction, mental health, criminality and disability. While AACS is supportive of the use of performance ratios for the measurement of quality schooling, it is very concerned that these ratios be determined following extensive consultation with all peak bodies and jurisdictions. AACS is concerned that the release of data into the wrong hands could be very damaging for morale and improvement in disadvantaged schools. On the other hand, AACS understands and supports the need for the Minister to collect and use the data to allocate resources differentially in support of the most needy communities. AACS believes that the recording and use of school based data should be carefully scaffolded with confidentiality protocols that prohibit the publication of data that would produce damaging outcomes for disadvantaged communities. AACS is totally opposed to anything that could give rise to the publication of league tables.
21	Indigenous Youth Mobility Program See Indigenous Education above	<ul style="list-style-type: none"> Will this program continue into the future? Where does it fit in relation to the NTER and the Government's Indigenous Education Reform Agenda? 	<ul style="list-style-type: none"> Watching brief

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22	NAPLAN	<ul style="list-style-type: none"> The NAPLAN reporting framework for individuals and schools The application of demographic data relating to NAPLAN results The allocation of funding on the basis of need and disadvantage to individuals and schools Accountability protocols attached to remediation strategies for students falling below national benchmarks 	<ul style="list-style-type: none"> AACS has no concerns in relation to the proposed format of individual and school based reporting of results from the National Testing in Years 3, 5, 7 and 9. AACS has no concerns about the collection of demographic data associated with the National Testing Program but believes that this information should not be published or released in such a way as to encourage league tables or the naming and shaming of disadvantaged schools. AACS believes that careful consultation between the Government and peak bodies needs to take place to ensure that funds are equitably and effectively allocated to both individuals and schools under the National Action Plan for Literacy and Numeracy to support the remediation of students who fall below the National Benchmarks. AACS believes that careful consultation needs to take place before accountability protocols are finalised in relation to funds allocated for the remediation of students who fall below the National Benchmarks.
23	Quality Teaching	<ul style="list-style-type: none"> Recruiting quality trainees Delivering quality training Providing and funding training programs in both the Government and Non Government sectors The appointment of quality teachers and leaders in all schools (Government and Non Government) Professional development criteria for maintaining quality teaching Strategies for retaining quality teachers and school leaders in both the Government and Non Government sectors The role of teacher registration authorities in defining and managing quality teaching in both the Government and Non Government sectors The funding of in-service, professional development and leadership preparation courses in both the Government and Non Government sectors. 	<ul style="list-style-type: none"> AACS is supportive of the Government's overall agenda to improve the entry requirements and to take more flexible approaches for the recruiting of new teachers. However, AACS also believes that this will require additional funds to support schools and universities in providing quality practicums and appropriate rewards for best practice training paradigms. Support the concept of a five year masters of teaching degree AACS believes that the definition of <i>quality training</i> needs to be independently expanded on to ensure consistency and substance in the training and professional development of teachers. Continuing consultation with peak bodies and professional organisations needs to be undertaken to ensure that school practitioners have a strong voice in prescribing the measures of quality teaching. AACS supports a longer period of practice under the supervision of a master teacher as a prerequisite for quality teacher training. AACS is concerned that the historic linkage between the funding of undergraduate positions based on the successful completion of courses places the universities under pressure to lower their standards and the quality of supervision in practicums that works against quality outcomes. AACS believes very strongly that funding of teacher training programs be made available to registered non government higher education providers provided that their courses meet requirements. AACS is supportive of the motivation of the Government to see quality teachers and leaders in all schools but is very concerned that the roll out of policies in relation to this matter follow thorough consultation with peak bodies. AACS is supportive of supplementary Government funding for short courses and in-services as a part of the mix arising from the Government's commitment to professional development. AACS is broadly supportive of the removal or reduction of HECS fees in return for a minimum period of service as a means of retaining teachers in the profession. In addition, AACS believes that the proposed National Award for Teachers needs to incorporate higher salaries and loadings for teachers working in remote and or designated disadvantaged schools. While AACS is not resistant to the role of Teacher Registration Authorities in defining and managing quality teaching in schools, it is concerned about the undue influence of unions in this environment and believes that thorough consultation with peak bodies and professional teacher associations should be the primary sources for managing quality teaching. AACS believes that supplementary funding for professional development and leadership training in both public universities and registered non government higher education providers should be provided to ensure that this aspect of Government policy is delivered equitably across all sectors.

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24	ESL Students	<ul style="list-style-type: none"> • Probing the breadth of disadvantage associated with new arrivals – e.g. immigrants, refugees, prior trauma, prior schooling etc • Maintaining ESL funding for new arrivals for at least 2 years 	<ul style="list-style-type: none"> • AACS believes that supplementary funding for highly disadvantaged recipients of ESL support should be extended beyond the provisions of the current program. Criteria for such additional funding should follow consultations with peak bodies. • AACS believes that, in the case of humanitarian immigrants who have received no prior schooling, the funding under the New Arrivals Program should be extended for up to 2 years subject to performance targets supervised under accountability protocols.
25	VET funding	<ul style="list-style-type: none"> • Australian Technical Colleges • Trade Training Centres • The Government's reform agenda for skills and workforce development (see appendix 1) • The implications of Commonwealth State Agreements and the "schooling" agenda in equalizing both access to and costs for VET training products • The role of NPs in resolving inequities and accelerating outcomes in the training context 	<ul style="list-style-type: none"> • AACS believes that, where appropriate, Australian Technical Colleges should be merged into the Trade Training Centres program for the purposes of consistency in criteria and funding. • AACS is cautiously supportive of the Trade Training Centres initiative of the Government. However, it is envisaged that the cost to schools of maintaining such centres will be a significant drain on resources that will require access to supplementary funding under various categories (e.g. training of staff, access to RTOs, management of industry experience programs etc) • AACS is concerned that, while the Trade Training Centres will provide access for training in high demand trades at the local level, those students interested in training in other trades will still have to access those via the TAFE system at considerable cost to the student or the school. • AACS is alarmed that huge inequities still exist between government and non government schools in terms of equity of access to and cost of courses delivered by TAFE colleges. AACS believes that these inequities must be removed as a part of the Commonwealth State Agreements if the Government is serious about its commitment to addressing the skills shortages. • AACS believes that the potential exists under the NP initiative of the Government to address the inequities referred to in the point above.
26	Broadband Penetration	<ul style="list-style-type: none"> • Access for remote communities to Broadband • Equity between urban and non urban access and connection costs 	<ul style="list-style-type: none"> • Watching brief • Watching brief. AACS believes that, with curricula increasingly requiring access to high speed broadband as a condition for satisfying outcomes, broadband access and high speed connections must be criteria for all schools at no cost to the schools.
27	Teacher Supply See Quality Teaching above	<ul style="list-style-type: none"> • Access to quality teachers committed to education in a Christian framework • Funding support for Christian Faith Based providers • Appropriation of funding initiatives on early childhood and indigenous areas between Government and Non Government providers 	<ul style="list-style-type: none"> • See sections 12 & 23 above
28	Publishing the Bullying Statistics See Data Collection, use and publication and Compliance Costs above	<ul style="list-style-type: none"> • National Safe Schools Framework • Correlations between disadvantaged localities and aggressive, unsafe behaviours • Potential damage to disadvantaged communities of publishing data that publicly condemns them 	<ul style="list-style-type: none"> • AACS is strongly opposed to the publication of bullying statistics under any circumstances. The policy is well covered under the National Safe Schools Framework and the concerns for students who suffer as a consequence of attending schools in disadvantaged/dysfunctional communities is potentially identified under other program initiatives, AACS believes that there is no need for a separate identification of bullying in this form.

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	Policy Area	Potential Issues	Notes
29	Values	<ul style="list-style-type: none"> • Faith based approach <ul style="list-style-type: none"> ○ Absolute versus relative frameworks for values education ○ Dialogue-based ethical enquiry approach ○ Politically determined approaches ○ The role of political correctness ○ The need for stability of values ○ Values for Australian schools 	<ul style="list-style-type: none"> • AACS is firmly committed to values derived from the Christian faith that underpins their member schools. While recognising that values may also be derived from different processes and different reference points, AACS rejects the imposition of any process based on relativism and/or consensus. On the other hand, AACS recognises that many values that derive from different processes have common outcomes.
30	Digital Education Revolution	<ul style="list-style-type: none"> • National Secondary Schools Computer Fund • Online curriculum resources • Professional development for new pedagogies involving ICT in the classroom 	<ul style="list-style-type: none"> • While broadly supportive of the program and the goals that the Government is seeking to address through this program, AACS notes that the on-costs and recurrent costs associated with this program are potentially very high indeed and that further funding will be needed to sustain the initiative over the longer term. AACS is committed to the view that supplementary funding is required to make this initiative sustainable. • AACS is broadly supportive of the funding of The Learning Federation's program of the development of online resources for use in relation to curriculum units. However, AACS believes that the accountability requirements attached to this program need to be strengthened to ensure that the funds applied to this initiative are in proportion to the value of the program to practising teachers. • AACS believes that supplementary funding to ensure that staff have access to the professional development required for them to deliver curriculum outcomes that demand IT competence should be made available to all schools on an equitable basis.
31	National Goals for Schooling	<ul style="list-style-type: none"> • The review of the Adelaide Declaration <ul style="list-style-type: none"> ○ Student focus compared to a school focus ○ Social outcomes as well as educational and economic outcomes ○ The role of parent-school partnerships ○ The importance of acknowledging world view assumptions underpinning National Goals 	<ul style="list-style-type: none"> • While AACS is supportive of the review, it believes there should be a stronger student focus and a stronger reference to social and values outcomes and a stronger role for parent-school partnerships. AACS also believes that there is an important role in National Goals for Schooling for identifying world views as a framework for bringing knowledge, skills, values, beliefs and attitudes together.
32	Award Modernisation	<ul style="list-style-type: none"> • The introduction of nationwide Awards. <ul style="list-style-type: none"> ○ National Award Standards. ○ National Award matters ○ The uniqueness of the schools industry ○ The provision for flexibility ○ The provision for differential conditions 	<ul style="list-style-type: none"> • Watching brief. AACS is committed to working closely with the AIs in negotiating the content of a National Award for schools. • AACS is concerned that a National Award, while providing for common standards in relation to certain matters still provides for flexibility and differentiation in relation to other matters e.g. isolation, risk, task definition, performance, responsibility, etc.