

Submission to the NSW Curriculum Review Interim Report Consultations

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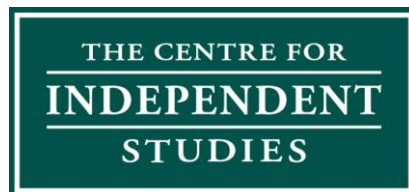


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Executive summary

- Recognising that the NSW Curriculum Review – by its own admission - raises issues that are common and relevant to all young Australians, the CIS submission frames the reform proposals within a broader national context and looks at the Review’s **vision, timing** and **evidence**.
- This reflects the Report’s reference to “increased national collaboration” and acknowledgement that “a first priority for governments has been to lift levels of student performance nationally, particularly in literacy and numeracy.”
- The CIS commends the NSW Government for its emphasis on the national good as it undertakes “a review of the NSW Curriculum to ensure it equips students to contribute to Australian society in the 21st century.”
- The CIS is concerned about the lack of a clear vision for school education in Australia — at both state and federal levels — and the dubious basis on which radical changes are proposed.
- Although the first of the four terms of reference requires that the Review “articulate the purposes of the school curriculum, including underpinning philosophies and principles”, the case for change is based only on familiar and repetitive references to “a world that is less certain and less secure” and “a period of rapid, ongoing change” in which “routine, low-skill jobs are being replaced by machines or lost to low-wage economies.”
- The Report offers no distinctive vision for Australian children, nor does it delineate the specific knowledge and understanding that school graduates should have in order to be able to “contribute to Australian society in the 21st century.”
- The CIS agrees that high academic expectations are a priority and that all students should reach high standards in key areas of learning by the time they leave school, but there is no evidence of the appropriateness or efficacy of the proposed approaches to curriculum design and assessment in the Australian school education context.
- Too little attention is paid to **what** students should learn, especially given the predictions of workplace challenges for future generations, and a disproportionate focus is placed on **how** they should learn.
- Overall, the quality of evidence offered in support of the reform proposals is poor.
- In particular, no evidence is provided to prove that redesigning the curriculum as a sequence of syllabuses corresponding to attainment levels has contributed to the success of any high-performing education system.
- The CIS is concerned about the emphasis on measuring progress towards the achievement of levels rather than measuring achievement against well-defined academic expectations.
- Australian school education – including that delivered in New South Wales – does not have the luxury of time to introduce untested curricular and pedagogical strategies when the academic foundations are demonstrably weak and there is a lack of understanding about the reasons why a high proportion of students leaves school with inadequate knowledge and skills.
- Significant duplication of effort – with its accompanying cost to the taxpayer – is foreshadowed in this Interim Report by virtue of the twin (and parallel) proposals for major curricular and pedagogical reform at state and national levels.
- The Report does not make the case successfully for the package of proposed reforms.

Foreword

The Centre for Independent Studies (CIS) welcomes the opportunity to participate in public consultation on the Interim Report of the NSW Curriculum Review (hereafter referred to as ‘the Report’).

The CIS is a leading independent public policy think tank in Australasia. Our work is driven by a commitment to the principles of a free and open society. The CIS is independent and non-partisan in both its funding and research. It undertakes no commissioned research and receives no government funding.

In deciding to contribute to the NSW Curriculum Review consultation process, the CIS was mindful of New South Wales’ influential role in Australian education, including the provision of a wide range of choices within the government school system and the state’s contribution to national policymaking and innovation.

The CIS also acknowledges the history and reputation of the New South Wales Higher School Certificate. That credential has international status, reflecting a longstanding commitment to academic rigour that is valued by both domestic and foreign students.

For these reasons, the CIS submission is divided into two sections. Recognising that the NSW Curriculum Review – by its own admission - raises issues that are common and relevant to all young Australians, the first section sets these in a broader national context. It looks at the Review’s **vision**, **timing** and **evidence** as part of what might be termed ‘the big picture’. This reflects, for example, the Review’s reference to ‘increased national collaboration’ and acknowledgement that ‘a first priority for governments has been to lift levels of student performance nationally, particularly in literacy and numeracy’ (p.7).

The second section addresses specific recommendations of the Interim Report.

As with any such undertaking, and given the significant, ongoing taxpayer investment in education, the CIS hopes that the consultation process and the final report will bring benefits for all.

Issues of national significance

1 Vision

The CIS commends the NSW Government for its emphasis on the national good as it undertakes ‘a review of the NSW Curriculum to ensure it equips students to contribute to Australian society in the 21st century’.

It is heartening to see a clear reference to Australian society, particularly at a time of strong globalist movements that arguably position education less as a means of individual academic achievement and more as a force for planetary wellbeing.

However, the lack of a clear vision for school education in Australia, at state and federal levels, and the dubious basis on which radical changes are proposed, are of concern.

At the top of the list of four terms of reference is the requirement that the Review ‘articulate the purposes of the school curriculum, including underpinning philosophies and principles’ (p.viii).

It is regrettable, then, that this Report continues in the same vein as its many predecessors, offering only familiar and repetitive references to ‘a changing world’, ‘a world that is less certain and less secure’ and ‘a period of rapid, ongoing change’ in which ‘routine, low-skill jobs are being replaced by machines or lost to low-wage economies’ (p. 4). There is nothing new or helpful here; indeed, the influence of the OECD’s Education 2030 Project – itself based on the United Nations’ Sustainable Development Goals – is most apparent in the language and priorities set for education in the 21st century.

The Report states that ‘the long term vision is for a future school curriculum that supports teachers to nurture wonder, ignite passion and provide every young person with knowledge, skills and attributes that will help prepare them for a lifetime of learning, meaningful adult employment and effective future citizenship’ (p. x). Citing submissions and other input to date, the Report acknowledges that these aspirations have already been ‘well captured in the *Educational Goals for Young Australians* (the Melbourne Declaration), the *Australian Education Act 2013*, the recommendations of *Through Growth to Achievement* (the Gonski report) and the propositions underpinning the Australian Curriculum’ (p. 13).

As is true of the national documents mentioned above, the Report provides no evidence of a distinctive vision for Australian children. There is no obvious attempt to embrace the unique history and contemporary nature of this country; most disappointingly, the documents do not delineate the specific knowledge and understanding that school graduates should have in order to be able to ‘contribute to Australian society in the 21st century’. The conclusion to be drawn from this philosophical deficit is that nothing distinguishes Australia or Australians from other countries and people; therefore, a generic vision is all that is required for education.

Another claim in this Report is that the ‘new and urgent challenge for schools and the school curriculum is to ensure that all students reach levels of attainment currently achieved by only some’ (p.x). How ‘new’ and how ‘urgent’ this challenge has become are both questionable, given the evidence of a long term, steady decline in Australian students’ academic performance provided by both national and international assessments. Concerns about the quality of curriculum, teaching, assessment and school management have been the subject of reports going back many decades. For example, one research paper written in 1992 stressed that ‘it is time real, not cosmetic, solutions to long-standing education worries were offered to Australians in a language which neither obscures

nor evades their underlying causes.’¹ Indeed, the CIS has argued repeatedly for a close examination of past policy decisions that might explain the current low levels of public confidence in school education. While the Interim Report contains a comprehensive historic summary of the evolution of schooling in Australia, there is no forensic analysis of how things have reached such a low ebb.

Basing an entire curriculum – and the associated pedagogy and assessment strategies – on the unsubstantiated and contestable view that ‘for today’s students, the world is less certain and less secure than it was for their parents’ and grandparents’ generations’ (p.4) is risky. Given that members of current generations have lived through and/or with war and deprivation, international instability, financial disruption and massive technological change, it is difficult to see how the ‘underpinning philosophies and principles’ of education in the 21st century should be so very different.

Critically, the vision disappoints with its minimal focus on the academic rigour that must be a renewed curricular and pedagogical goal if Australian education is to improve. The word ‘rigour’ seems to be used only five times in 112 pages; only once is it mentioned as an aspiration (p. 74), and the remainder are references to feedback in submissions. Used only slightly more frequently, the word ‘rigorous’ was almost exclusively associated with the senior secondary curriculum.

Rather than setting up strong arguments for **what** students should learn, based on what it identifies as the major challenges, the Report focuses largely on **how** they should learn. In arguing for ‘every student making excellent, ongoing progress toward high attainment’, the Report claims that the key is ‘for the curriculum to provide sufficient flexibility, time and space for teachers to identify and understand individual learning needs and to tailor their teaching accordingly’ (p.23).

Australian school education – including that delivered in New South Wales – does not have the luxury of time to introduce untested curricular and pedagogical strategies when the academic foundations are demonstrably weak and there is a lack of understanding about the reasons why a high proportion of students leaves school with inadequate knowledge and skills.

Unlike high-performing education systems whose philosophies and practices have been developed with great care over a long period and enable the cohesive, confident consideration of new approaches in response to new challenges, Australian education – at least in recent decades – has been characterised by inconsistency and uncertainty. The lack of vision manifests as a philosophical and practical deficit, compounding the policy complexity of each state setting its own academic standards in the senior secondary years, managing its own assessment and reporting protocols for Kindergarten to Year 10, and preparing its students for participation in a national testing regime (NAPLAN) that has demonstrably low minimum standards and has arguably become the default curriculum for English and Mathematics. This is not the time for experimentation at a state or federal level.

Australian students deserve an education that sets the highest standards for their scholarly and personal development; a clear vision for their preparation as citizens of this nation and the world must be central to the design of the curriculum. Such a vision cannot simply parrot the language of others.

Notably, while the Report dedicates considerable space to how the curriculum could be designed to support student learning, it makes no practical suggestions for preparing young citizens to contribute to Australian society. Indeed, the word ‘citizenship’ appears to be mentioned only twice in 112 pages, giving the impression that the Review’s overarching goal is simply tokenism.

¹ *Educating Australians*. A Report of the Education Policy Unit. Institute of Public Affairs. 1992, p.1

Many Australian students leave school without a sound grasp of this country's socio-political evolution and the ways in which education can position them confidently for adulthood. The NSW Review lists student wellbeing, mental health and the development of personal and social capabilities as priorities identified in submissions from school-based sources. Others referred to 'a vision of the kind of people they want students to be by the time they leave school, which in turn reflected their aspirations for the future of Australian society' (p. 14). Any review of school curriculum – particularly one that is tasked with preparing students to contribute to the national good – should have this as a consistent theme.

In contrast, the world-leading Singapore system delineates a clear and profound vision for the national objectives of education. As part of 'instilling deep values and building foundations for learning', a fundamental goal is to 'cultivate values and commitment to Singapore and fellow Singaporeans.' According to the Ministry of Education, the Singapore curriculum philosophy is to ensure that students "are future-ready, have a strong sense of national identity, and are equipped to contribute in a globalised world". From Kindergarten to Year 6, character and citizenship education helps primary school students to "understand their roles in shaping the future of our nation". Underpinning the high school curriculum, the four desired outcomes of education revolve around developing "a concerned citizen" who "will grow to be proud of Singapore and understand our country within the global context at the post-secondary level".

In summary, the Report meets 'the primary goal of the Review ... to develop a long term vision for the curriculum in NSW' (p.1), but it does not provide a clear vision of the student – something in the order of a graduate profile – who is to emerge from schooling under the proposed changes.

2 Timing

Notwithstanding the legislated responsibility for school education held by New South Wales – in line with that of all states and territories – and its right to undertake any review in this area at any time, this jurisdictional review highlights several policy conundrums that affect all young Australians.

These include the relationship of the Australian Curriculum (the 'national' curriculum) to its state and territory counterparts, the absence of agreed national academic standards for Kindergarten to Year 12 (especially in literacy, numeracy and digital technology), the variable quality of initial teacher education programs and ongoing professional development, challenges around school leadership and management (including the role of parents and carers), and the contribution of research to school education policy and practice.

The fact that a separate review of the Australian Curriculum is scheduled for 2020 must raise questions about its status vis-a-vis any recommendations made about the NSW Curriculum. At the very least, it would seem to run counter to the Melbourne Declaration's conclusion that 'As signatories to the Melbourne Declaration, Australian Education Ministers seek to achieve the highest possible level of collaboration with the government, Catholic and independent school sectors and across and between all levels of government.'² Although the NSW Review's terms of reference include a stipulation that the Review consider the findings of the 2014 Review of the Australian Curriculum, there is no statement of intent to draw on, let alone adopt, a future iteration of the national document.

Further, the NSW Curriculum Review addresses curriculum for students in Kindergarten to Year 12, without detailed reference to the Senior Secondary Pathways Review that is also underway. This is

one of eight national policy initiatives arising from the National School Reform Agreement. The high number of reviews, seemingly disconnected from each other and frequently running in parallel to jurisdictional reviews, indicates a worrying lack of overarching, shared vision and genuine collaboration in Australian school education.

Yet New South Wales students cannot be regarded as significantly different from their peers in other jurisdictions. Indeed, the Interim Report makes the point that ‘the context for this Review includes current national concerns about stagnating or declining levels of student attainment’ (p.12). Just as all students are disadvantaged by poor curriculum and teaching, they will be lifted by improvements that are based on sound evidence and careful policymaking. The judicious use of taxpayer funds to undertake research and reviews should reflect genuine collaboration, the theme repeated so often in key national documents such as the Melbourne Declaration.

Taxpayers, students and parents are entitled to ask about the extent to which each review might inform the others, particularly in view of implications for student mobility across state borders and the impact of changes to exit credentials.

One interpretation of this lack of synchronicity may simply be that New South Wales prefers to respond unilaterally to the recommendations of the *Review to Achieve Educational Excellence in Australian Schools* which informed the *National School Reform Agreement*, signed by all state and territory ministers in 2018-2019.³ The two key proposals for improving student performance are to recast the Australian Curriculum as a series of ‘learning progressions’ and to require teachers to utilise ‘online formative assessment’ tools aligned to the curriculum to monitor individual progress.

In the interests of national collaboration and funding efficiency, it is difficult to understand why New South Wales would pre-empt such commitments.

On the other hand, the New South Wales government may legitimately point to federal approval of the recommendations as a green light to proceed along similar lines at the jurisdictional level.

Significant duplication of effort – with its accompanying cost to the taxpayer – is foreshadowed in this Interim Report by virtue of the twin (and parallel) proposals for major curricular and pedagogical reform. The NSW proposal is to rewrite the curriculum as ‘a sequence of attainment levels, each with an associated syllabus’ (p. 108) and to introduce methods of assessment ‘that are based less on judging student learning and more on understanding where individuals are in their long-term progress for the purposes of supporting further learning’ (p. 110).

This labour-intensive, highly differentiated and administratively burdensome approach is reminiscent of past policy changes which also rejected ‘the mindset in which teaching is viewed only as a process of delivering a pre-specified syllabus to all students in the same year of school in the same way’ (p.110).

In this regard, taxpayers and stakeholders should also be questioning the failure of the Report (and the national initiatives) to begin by considering past policies and trends – and their direct impact on teachers and students – when proposing reforms that look very much like reinvention of past failures. For example, the adoption of Outcomes-Based Assessment (Australia was one of very few countries or systems to implement this approach) in the 1980s revolved around precisely the same goals of setting out developmental progressions that all students would follow in different ways and timeframes, with teachers expected to cater for maximum individual diversity and ‘formative’

³ Council of Australian Governments. 2018. National School Reform Agreement. <https://www.education.gov.au/national-school-reform-agreement-0>

assessment tools used to evaluate progress against defined steps rather than measuring students against each other in the more traditional ‘normative’ manner.

With specific reference to school curriculum, each jurisdiction has been free to implement the Australian Curriculum according to a timeline of its choosing, resulting in significant variation across the nation.

In the case of New South Wales, ‘NESA syllabuses include agreed Australian Curriculum content and content that clarifies the scope, breadth and depth of learning. The Australian Curriculum achievement standards underpin the syllabus outcomes and the Stage statements for Early Stage 1 to Stage 5’.

In practical terms, discrete state and territory implementation processes have had a direct impact on consistency and quality in teacher training, professional development, assessment and reporting strategies, and many other aspects of delivery. Successive monitoring reports published by the Australian Curriculum, Assessment and Reporting Authority (ACARA) provide evidence of jurisdictional variations in the delivery of the curriculum as well as longstanding demand for support for teachers.⁴ Apart from concerns about bureaucratic overlap and duplication of effort, it is not clear how significant variations in policies and practices benefit young Australians, particularly when the implementation of a national curriculum was promoted for its capacity to enhance student mobility across schools and systems.

This is particularly true of New South Wales, where education authorities have elected not to use the Australian Curriculum website, which is the repository of all original documentation and support materials. Instead, New South Wales schools and teachers rely on syllabuses developed separately by the NSW Education Standards Authority (NESA), as well as associated materials developed by NESA, the Department of Education and a range of sector-based and professional bodies.

An obvious question is about cost to the taxpayer. Although the NESA has been redeveloping multiple syllabuses into the period of the NSW Curriculum Review – it seems very likely that significant public funds will have to be spent on repeating this exercise within the near term. Given that the Report’s Reform Direction 6 recommends reorganising ‘the K-10 curriculum into a sequence of syllabuses, with each syllabus corresponding to a particular level of attainment (knowledge, understanding and skill) rather than a particular year of school’ (p. 88), such a plan would likely involve considerable time and expense. Government decisions around expenditure on education, including the recent commitment to outcome budgeting, would benefit from a separate evaluation of bureaucratic duplication of effort as well as growth and gain in student performance over time.

On the basis that ‘the concern most commonly raised with the Review related to the ‘overcrowding’ of the curriculum’ (p.76), and there are ‘widespread concerns about the volume of content in most NSW syllabuses’ (p.24), it must be assumed that all ongoing syllabus work – which also involves substantial public consultation – reflects these concerns and has already resulted in a reduction in content. It is to be hoped that sophisticated tools are in place to measure teacher satisfaction with the new syllabuses and to inform any future syllabus development work.

Considering that overcrowding was a major finding of the Review of the Australian Curriculum in 2014, resulting in some reduction of the national document’s content, it would be logical to assume that NSW authorities would have actively addressed all such concerns as part of subsequent jurisdictional work.

⁴ ACARA. Monitoring the effectiveness of the Foundation to Year 10 Australian Curriculum reports
<https://www.acara.edu.au/curriculum/monitoring-reports>

However, the Report's own findings are that 'NSW had chosen to develop syllabuses with a greater degree of detail than the Australian Curriculum by including additional learning outcomes, content descriptions and supporting information', the result being the continuation of 'a long tradition of prescription and control of schools and their activities' (p. 26).

According to the Report, teachers feel pressured by the amount of content they are expected to cover, 'often skating across the surface of the curriculum' (p.76). While 'this was not true of all syllabuses, including some recently redeveloped syllabuses ... a consistent comment from many teachers was that there was simply too much to cover in most syllabuses' (p.76).

3 Evidence

The least satisfactory feature of the Report is the nature and quality of evidence provided to support the specific recommendations. The paucity of scholarly analysis means that no effective case is made for the time-consuming and expensive proposed reforms.

Given the scale of the reform directions, and remembering the document's premise that this work is a 'new and urgent challenge' (p. x), this document should – at a minimum – point to convincing international examples and robust research to show why the reforms should be considered and how they are likely to be effective in the Australian context.

Despite the admission that 'the changes proposed by the Review are significant' (p. x), the NSW Report does not include a comprehensive literature review of local and international developments in curriculum design, with a close focus on research relevant to the key reform proposals. Instead, the report relies on vague references to 'research' in a range of other areas that reflect unproven practices and trends. There are relatively few citations, many of which provide no definitive support for the claims that are made.

For example, an opening statement in the section headed Guidance from Reform Initiatives contends that 'evidence that attempts to drive improvement through increased specification and accountability have been largely ineffective' and 'most systems are now shifting the balance toward flexibility and autonomy' (p.47). The first assertion is not substantiated and no details are provided about the precise experience of 'most systems' or even which these are.

The section 'briefly reviews international experience in reviewing and reforming school curricula' (p. 47). It contains a wide-ranging collection of topics such as flexibility and teacher autonomy, general capabilities, vocational learning, proficiency standards and numerous others that neither carry a consistent theme nor make the case for curricular or pedagogical reform. Again, general statements and broad conclusions abound, with little evidence of careful analysis of relevance to the Australian context.

The research alludes to curricular and pedagogical shifts already undertaken or under consideration in high-performing countries. While the material is of general interest, there is no acknowledgement of the particular challenges faced in Australian school education and the very different academic and professional baselines from which Finland, Singapore, South Korea and others start as they consider change.

For example, according to NAPLAN data, up to 25% of students complete Year 10 unable to demonstrate the literacy and numeracy skills required for the workforce or further education. Additionally, teacher training is extremely variable in quality, and many Australian teachers – especially in mathematics – do not have high-level subject expertise, particularly in mathematics,

science and foreign languages. Classroom management is a well-researched area of weakness, and student behaviour is worse than in many other countries, yet teacher instruction and school discipline are critical factors in student achievement, according to OECD research.⁵ While the 'proposals assume the incorporation of a 'teaching' mindset into all aspects of the broader schooling system' (p.111), the Report offers no analysis of how Australian students and teachers would overcome such hurdles in preparation for radical policy shifts.

Another generalisation is that 'reduced specification of curriculum details and increased flexibility are considered to deliver a number of benefits' (p.48); once again, little detail is given to substantiate this. The Report mentions a 2013 study by the National Foundation for Educational Research in England (a country not classified as high-performing) that 'identified curriculum flexibility as a feature of high-performing school systems', but concedes that 'studies of this kind have not established a causal relationship between curriculum flexibility and student performance' (p. 47).

Similarly, the Report claims that 'in practice, examples can be found of both extreme prescriptiveness and extreme flexibility' (p.71). No examples of these extremes are cited. A reference to American research argues that 'an important feature of high-performing systems is their expectation that every students will study a common, core curriculum – usually from the beginning of school until about Year 10 – and *will achieve a specified standard of attainment on that curriculum* [italics in the original].⁶ No original research from or relating directly to the high-performing countries is referenced. If this vague reference is intended to support the case for rewriting the NSW curriculum to describe attainment levels, the point is not made successfully.

Likewise, the Report makes the self-evident statement – citing a 2005 article from the United States (another country not classified as high-performing) – that 'interest in learning progressions has been motivated in part by the observation that curricula in countries that perform unusually well in international surveys such as the Trends in International Mathematics and Science Study (TIMSS) are structured to develop increasingly sophisticated understandings of core disciplinary ideas across the years of school.'⁷ This does not make the case for introducing attainment levels in New South Wales.

Another example of stating the obvious comes in the claim that 'it is usual in high-performing countries to set standards for satisfactory completion of secondary education' (p.60). Such statements, especially when presented without evidence, add nothing to the Report's case for sweeping reforms to the curriculum and pedagogy.

The five-page section titled Guidance from Learning Research addresses research into topics such as deep understanding, motivation, progress in learning, learning environments and metacognition. The material does not make a successful case for any of the proposed curricular reforms, particularly where it offers unsubstantiated assumptions and draws illogical conclusions. For example, when addressing 'the science of learning', the claim is that:

⁵ OECD. 2016. PISA 2015 Results (Volume II): Policies and Practices for Successful Schools. www.oecd.org/education/pisa-2015-results-volume-ii-9789264267510-en.htm p. 228

⁶ The NSW Interim Report does not provide a citation for the US National Center on Education and the Economy (NCEE) material, but points to Tucker, M. 2019, Leading high performance school systems: lessons from the world's best, Association for Supervision and Curriculum Development (ASCD), Alexandria, VA (see Interim Report p. 60)

⁷ Reference is to WH Schmidt, HC Wang and CC McKnight, 'Curriculum coherence: an examination of US mathematics and science content standards from an international perspective', Journal of Curriculum Studies, vol. 37, no.5, 2005, pp.525-559 (see Report p. 52)

‘expert/novice studies show that the simple accumulation of knowledge and the memorisation of facts and procedures are inadequate for analysing and solving significant new problems or tackling complex challenges. Activities of those kinds require deep understandings of a field developed over many years through exposure to a wide variety of related problems and challenges.’ (p.42)

The inference to be drawn here is that a narrow approach to teaching and learning in previous eras somehow precluded sophisticated analysis and problem-solving. This is a fallacious argument that is not supported by the ‘expert/novice studies’ mentioned in the Report. Indeed, even if one accepts that the 21st century has brought problems of such complexity that older methods of teaching and learning – including the requirement to memorise information – no longer apply, such an accusation is patently unfair to generations of educators who have designed rigorous curriculum and taught children to be intellectually curious and ambitious, with extraordinary results over centuries. It is a complete *non sequitur* to imply that human beings can now thrive academically only through a redefinition of the process of acquiring ‘expert knowledge’.

Similarly, the proposal to recast the NSW curriculum in the form of attainment levels is not supported with evidence that ‘learning progressions’ are responsible for the success of high-performing systems. For example, the Report simply states, without citation, that

... research studies have investigated progressions of developing understanding in areas such as science and mathematics ... the belief is that more explicit, evidence-based descriptions of how learning occurs in practice will provide an improved basis for structuring curricula and deciding appropriate instructional sequences, as well as better frames of reference for establishing where learners are in their learning and monitoring improvements over time. (p.45)

A few references to American research into the use of learning progressions in science are provided (p.52), as is some discussion of the importance of proficiency standards and aligned curriculum frameworks (p.61). The material is not specific enough to assist in any deep evaluation of the proposed NSW changes.

It is important to note that New South Wales is a signatory to the National Schools Reform Agreement which purports to set out ‘reform directions supported by national policy initiatives and bilateral actions that are based on evidence of what works.’⁸

With regard to evidence, S. 43 of the Agreement specifies:

The reform directions will be progressed nationally through national policy initiatives that:

- a. recognise and build on existing national, State and Territory and sectoral reform activities that are proven to be lifting outcomes for students
- b. have a robust and evidence-based rationale for how national policy initiatives will directly or indirectly improve outcomes through national coordinated effort
- c. concentrate reform efforts on the key enablers that drive improvement in educational outcomes

⁸ https://docs.education.gov.au/system/files/doc/other/national_school_reform_agreement_8.pdf

- d. take into account jurisdictional and sectoral context and allow for jurisdictional and sectoral flexibility in implementation of national policy initiatives, including in resource allocation. (p.8)

The terms of reference for the NSW Curriculum Review stipulate that it will have regard to certain national and state documents. A further requirement is to consider 'corresponding work of the Australian Curriculum, Assessment and Reporting Authority (ACARA) to review and refine the Australian Curriculum, including international research' (p.ix).

Whatever the New South Wales commitment may be to national education initiatives, it would seem appropriate for a major review of a jurisdiction's curriculum to refer to the program of research conducted by ACARA in 2017-2018.⁹ That undertaking was a key component of the 2016-2020 quadrennial plan approved by all states and territories and intended to inform the review of the Australian Curriculum scheduled for 2020. It includes a comprehensive literature review. The research comprises a series of international comparative studies of curriculum, including Finland, Singapore and British Columbia (Canada). These three countries were selected – as per Education Council guidelines – because of their demonstrated achievement in lifting student performance as a result of reforms in curriculum design, teaching and assessment.

All had recently reduced the amount of curriculum content, and they cooperated with ACARA curriculum specialists to validate highly detailed year-level comparisons of breadth, depth and rigour across the key learning areas. None indicated that the academic success of their students was due to the redesign of the curriculum as a mix of 'learning progressions' or 'attainment levels', accompanied by 'formative' or 'informative' (p.72) assessment.

A key common feature was the commitment to creating a rigorous, succinct curriculum that would give clear guidance to all teachers while allowing maximum local flexibility. Notably, the NSW Report states that the 'challenge is to design a curriculum that promotes deep learning and provides teachers with the flexibility they require' (p.11). It also emphasises that 'High-performing school systems recognise that the content and structure of the curriculum are important determinants of the quality of student learning' (p.12). However, the proposed solution of 'attainment levels' is not defended on the basis of its success in high-performing systems and countries. While it is listed among the Useful Links on the NSW Curriculum Review website, ACARA's program of research does not appear among the sources used for the Report.¹⁰

A final point about the policy disconnect between national initiatives and the activities underway in New South Wales is that similar research is being conducted at both levels of government, hardly conducive to efficient expenditure of public funds or to the streamlined, collaborative exploration of policy solutions to shared problems.

Three federal government entities have been involved in the Discovery Phase of the National Learning Progressions and Online Formative Assessment Initiative.¹¹ According to ACARA, which is leading the project:

⁹ ACARA. Program of Research 2017-2020 (International Comparative Studies)

<https://www.australiancurriculum.edu.au/resources-and-publications/publications/program-of-research-2017-2020/>

¹⁰ See References pp. 113-116

¹¹ The three government bodies are the Australian Curriculum, Assessment and Reporting Authority (ACARA), the Australian Institute for Teaching and School Leadership (AITSL) and Education Services Australia (ESA).
<https://www.lpofai.edu.au/>

In the discovery phase, there are three main foci: learning progressions and aligned assessments; engagement with teachers to understand what they need and how they want to be able to work; and research into evidence of effective practices.

The various activities provide clear evidence of duplication of effort.

It is clear that taxpayers are funding simultaneous research on areas of national interest, with no guarantee of a return on investment for students in New South Wales or other jurisdictions.

Overall, the CIS has strong reservations about the quality of the research that underpins the reform directions proposed in the Report, particularly in relation to evidence of effective practices.

The following recommendations are made for the next phase of the NSW Curriculum Review.

Recommendation 1

Define precisely how the proposed curriculum reforms will develop students' capacity to contribute to Australian society in the 21st century, with relevant evidence drawn from high-performing countries and systems.

Recommendation 2

NSW should support a renewed commitment to setting high national academic standards for Kindergarten to Year 12 and collaborating on the (re)development of the national curriculum, ensuring consistent teaching standards, and shared and effective assessment and reporting strategies.

Recommendation 3

Provide a comprehensive literature review of curriculum design strategies, with a specific focus on their capacity to contribute to improvements in Australian school education

Recommendation 4

Provide a detailed, scholarly analysis of the potential for 'attainment levels' and the associated reform directions to deliver improvements to teaching and learning in New South Wales schools

Recommendation 5

Provide a thorough analysis of existing educational deficits and barriers that will need to be addressed in order to enable effective reforms

Reform directions

Previous sections of this submission outline concerns about the vision underpinning the proposed curriculum reforms, the quality of the research cited in support of the reforms and the general timing of the NSW Curriculum Review. These three areas of concern are re-emphasised as part of the response to the Report's admission that 'the first question is whether these are appropriate directions for reform' (Preface).

The statement that 'change is required' (p. v) is undoubtedly true, but the Report does not offer sufficient evidence to support a shift to attainment levels and the associated reforms.

The fifteen proposed reform directions contain considerable overlap and would benefit from consolidation.

Some general points are provided below in response to the proposed reform directions.

Reform Direction 1 Creating a less crowded curriculum

Evidence of overcrowding and unhelpful pressure on teachers and schools has been available for many years; it seems counter-intuitive that this Review is raising it now, given that New South Wales has always maintained its own curriculum, has recently invested heavily in redeveloping multiple syllabuses, and any future review of syllabuses is likely to repeat this work.

Any changes to curriculum content should be based on:

- A clear vision for Australian school education
- A precise definition of the purpose of education for Kindergarten to Year 12
- The clear description and justification of core learning – a common entitlement – to be achieved by all students in Kindergarten to Year 12, with a particular emphasis on literacy, numeracy and digital technology developed through learning areas
- An explanation of the teacher expertise required to support core learning and where best practice can be found, including the initial teacher education programs that prepare them to:
 - use 'real-world applications and hands-on experience' to increase students' motivation and engagement (p.63)
 - model and teach high standards of literacy, numeracy and digital technology in order 'to put knowledge to work' (p.63)
 - provide a mix of theory and application (p.63)

Reform Direction 2 Promoting deep understanding

If 'deep understanding' is to be achieved through the redesign of the curriculum, strong evidence must be provided that this can be achieved through the use of attainment levels. Examples of successful implementation of attainment levels in high-performing school systems should be cited. It is not proven that following prescriptive, incremental 'steps of learning' will encourage students to progress more effectively, or even that unequivocal evidence exists for identifying and describing these steps.

The attainment level model risks a lock-step approach that may be constraining for the wide range of learners. In foreign language study, for example, given the importance of rapid and high-volume memorisation of grammatical rules and vocabulary and the tendency for students move in different

directions depending on background and practice, it is unclear how such an atomised approach would work.

Reform Direction 3 Building skills in applying knowledge

By definition, deep learning – including the study of big ideas and the sophisticated application of conceptual skills – must be led by knowledgeable, effective teachers who can set and model consistently high expectations (p. 88). Any jurisdictional review of the curriculum should include a commitment to ensuring the highest standards of teacher selection and education and accreditation only of tertiary programs that meet the expectations.

The key element is the teacher. This goal depends less on the amount of time available to students than it does to the teacher's expertise in modelling the application of knowledge in real-world contexts. Rather than emphasising subject mastery, the quality of teaching seems overly tied to a 'mindset' that 'places students at the centre of the learning process' (p. 110). Evidence for this approach – especially for its effectiveness in the New South Wales context and time frame – is not adequate.

The focus on so-called 21st century skills is over-emphasised and risks a continued failure to prioritise teacher expertise in the core disciplines.

While an effective curriculum identifies other skills to be acquired alongside the acquisition of knowledge in any discipline, few of these are truly new (for example, digital technology is an exception due to the rapidity of change) and can be incorporated quickly and efficiently by highly trained subject specialists.

Reform Direction 4 A common entitlement

The critical issue of *what* students are to learn must be addressed as part of the vision for Australian school education, and a strong case must be made for any proposed changes to the curriculum. At present, in spite of some reassurances about the importance of disciplinary knowledge, national and international documents guiding decisions about curriculum content privilege a '21st century learning agenda' that does not offer practical solutions in the Australian or New South Wales context.

The greatest common entitlement for every Australian student is the development of sophisticated English language skills – these are crucial to the effective engagement with all other areas of the curriculum.

At this stage, the focus should be less on whether a student should pursue an academic or a vocational pathway than the core knowledge, skills and attributes with which school leavers should be equipped. That is the overarching challenge for any review of the curriculum.

The proposal to make foreign language study compulsory from primary school as part of a 'common entitlement' is supported, albeit that this constitutes one of only a few specific proposals regarding learning areas, and the absence of an holistic view is unhelpful.

Notwithstanding the Report's brief acknowledgement of the well-researched benefits of the study of additional languages (including the obvious association with 21st century skills and the globalist philosophy), this was the opportunity to make a strong case for specific changes to the vision and goals of school education in Australia. However, this vital section (pp. 80-83) does not offer the

research material and detailed references to international examples that respondents could use to make more informed judgments.

Reform Direction 5 Creating a more flexible curriculum

In principle, the notion of ‘a more flexible curriculum that enables teachers to be guided by their professional judgment about what to teach, when to teach and how long to spend teaching it’ (p.85) sounds ideal. In reality, this is fraught with risks, mainly relating to the variation in teacher expertise. Such an approach demands superbly trained professionals who have the confidence to enter any classrooms; this is not the Australian experience. Even if universities could be persuaded to align all of their philosophies and programs to such an approach, the time lag would be significant and many other factors would also need to change.

This Report provides no evidence to prove that reorganising syllabuses into a sequence of ‘attainment levels’ will not be as, or more, constraining and labour-intensive for teachers because of a new requirement to monitor individual students as they progress through a highly prescriptive set of descriptions that purport to define the steps of learning in each subject. It is difficult to see how the proposed reorganisation creates a flexible curriculum; it is arguably the pedagogy that is flexible, not the curriculum itself.

Reform Direction 6 Restructuring the curriculum

See Reform Direction 5.

Reform Direction 7 Setting high expectations

As the Report states, ‘the pressing curriculum challenge is to set higher curriculum expectations for every student’s learning (p.11). This should be the first priority, linked directly to policy decisions around teacher training, and should be the first reform direction.

Australian education suffers from the fact that NAPLAN sets such low expectations that 90% of all students meet the minimum standards, yet their lack of knowledge and skills is revealed in other forums such as PISA.

Establishing and maintaining high expectations is what distinguishes highly effective education systems. The Review rightly points to the significant number of Australian students who do not achieve the minimum levels of reading and numeracy in international tests of 15-year-olds (p. 8), and the urgent need to address this is reinforced by Australian students’ poor results – across all three domains – in the 2018 PISA tests.¹² The NSW Curriculum Review will no doubt take into account the disappointing results for New South Wales students, particularly in relation to the increase in the proportion of students not meeting the National Proficient Standard and the decline in the number of high performers from advantaged backgrounds.

This section of the Report makes no reference to the achievement standards set out in the Australian Curriculum, an odd omission given the supposed national commitment to that document and its role in describing ‘to teachers, parents, students and others in the wider community what is to be taught and the quality of learning expected of young people as they progress through school.’¹³

¹² Thomson, Sue; De Bortoli, Lisa; Underwood, Catherine; and Schmid, Marina, "PISA 2018: Reporting Australia’s Results. Volume I Student Performance" (2019). <https://research.acer.edu.au/ozpisa/35>

¹³ Australian Curriculum Overview <https://www.australiancurriculum.edu.au/f-10-curriculum/learning-areas/>

There is a tension between the Report's proposal to have students progress through the attainment levels at an individual pace while expecting them to 'achieve at least minimum (but high) standards' (p.64). Not enough detail or research evidence is provided to understand how this would happen, or what 'minimum (but high) standards' would look like. This is compounded by a broad statement that the standard for Year 10 students 'would represent the level of performance required to function effectively in adult society' (p.88).

A much more constructive approach would be to identify the standards set for Year 12 and to work back from that. One of the weaknesses in Australian school education is the absence of nationally agreed standards for senior secondary students, at least in the core subjects.

This reform direction – like many others – should emphasise intellectual rigour and subject mastery for both teachers and students.

Reform Direction 8 Monitoring whether learning is on track

The case for rewriting the curriculum as a mix of attainment levels and informative assessment is not made. If New South Wales is to go down this path, it should be based on specific examples of similar approaches in high-achieving school systems.

Reform Direction 9 Ensuring continuity of learning

It is sensible to think of a curriculum as a continuum, delineating desired achievement and enabling smooth transitions between stages of learning.

High-performing countries such as Singapore and Finland and some systems in Canada have recast their curricula as succinct statements to guide teachers while allowing maximum flexibility to teach the material in ways they deem appropriate.

Reform Direction 10 Assessing and communicating learning

The Review's position that 'the approach to assessment proposed by this Review is based less on judging student learning more on understanding where individuals are in their long term progress for the purposes of supporting learning' (p. 110) is problematic. Likewise, the proposal for 'intermittent communication of attainment of levels' (p. 108) to 'replace the reporting of grades ... at fixed times of the year' is not supported by evidence from high-performing education systems. This approach sounds sensible, and if well managed could turn out to be an improvement on current practice, but there would likely be significant pressure on schools to establish a new schedule of reporting to ensure that parents knew when to expect information.

While all students deserve maximum support for their learning, few young learners have the intrinsic motivation to excel in all areas of the curriculum and many – perhaps most – will benefit from healthy competition. Making judgments about academic achievement should include periodic – even regular – comparisons of students studying the same courses, in part because this is preparation for adult life and in part as a means of reflecting on professional practice. Making hard judgments rather than simply 'evaluating whether a student is on track' is especially important if teachers are to ensure that every student reaches the standard of proficiency expected of them when they leave school.

Reform Direction 11 Creating a more integrated curriculum

In the absence of a clear vision for school leavers, it is difficult to comment on the creation of a more integrated curriculum for senior secondary students.

Reform Direction 12 Recognising progress and attainment

It is unfortunate that the Report promotes a continued separation – even isolation – of the senior secondary years and does not canvas other ways of writing the curriculum for the benefit of students and teachers at all stages of schooling. Greater streamlining and integration of the curriculum across all stages of learning would be of benefit to students, particularly given the distinctive challenges of teaching and learning in rural, regional and remote areas where there are fewer school choices (e.g. central schools for 7-10 only) or where parents opt for home schooling.

A true and more effective continuum of learning in each core subject would specify achievement goals for all years of schooling; that is, English would be mapped for students beginning in Kindergarten all the way through to Year 12. That would give all teachers – regardless of the classes they teach or the nature and level of their training – a clear understanding of the expectations of learning. High expectations at Year 12 are the key, and all work done in the earlier years should aim to reach or exceed these.

Again, this reform direction should be based on a clear vision for Australian school leavers.

Reform Direction 13 Introducing a major project

Mandating that each student does a major project as part of the HSC has potential risks which should be addressed. The problem with giving take-home assessments such a significant weighting is the lack of accountability and equity — students from more advantaged backgrounds generally have greater access to help from parents and tutors. There are obvious implications for students from less advantaged social backgrounds.

A key strength of examinations is that they directly assess student knowledge and skills at a point in time. Examinations can also more appropriately test across the breadth of required course content. Completing applied projects may be suitable in drawing on some aspects of a course's learning outcomes, but it is unlikely that any projects could adequately cover all learning outcomes in an objective way.

Reform Direction 14 Redefining learning areas

This reform direction is not based on a clear vision for the Australian school leaver. All decisions about nature and types of senior secondary courses should emanate from careful consideration of the graduate profile.

Reform Direction 15 Reviewing ATAR

There is a case for reviewing the ATAR. The fundamental issue with ATAR currently is the inconsistency in quality between state and territory Year 12 certificates. As a result, the national ranking is not necessarily a fair representation of relative student ability.

All students are entitled to some end-of-schooling exit score, irrespective of their intentions for post-schooling education or work. The ATAR, despite its limitations, is the only indicator to help inform

post-schooling decisions of individuals, for institutions to assess prospective students, or for employers to evaluate competing candidates.

It is important that ATAR remains focussed on academic ability rather than extra-curricular activities. Despite regular commentary to the contrary, the ATAR remains the main means of admission to undergraduate degrees; 80% of Year 12 student admissions are based on the ATAR methodology. ATAR rankings are closely related to academic achievement and dropout rates at university.¹⁴

The recent proposal to replace the ATAR with a 'learner profile' focussing on extra-curricular activities rather than academic achievement to get into university¹⁵ would be especially unfair for high-achieving disadvantaged students. Advantaged students tend to have more extra-curricular opportunities, so they would gain an unfair benefit in competing for university places against disadvantaged students.

END

¹⁴ Norton, A., & Cherastidham, I. 2018. *Dropping out: The benefits and costs of trying university*. The Grattan Institute. <https://grattan.edu.au/wp-content/uploads/2018/04/904-dropping-out-the-benefits-and-costs-of-trying-university.pdf>

¹⁵ See Baker, J. 2019. *Beyond ATAR: Calls for 'learner profile' to replace uni entrance rank*. The Sydney Morning Herald. <https://www.smh.com.au/education/beyond-atar-calls-for-learner-profile-to-replace-uni-entrance-rank-20191001-p52wi0.html>