



PRIORITISING TEACHING AND LEARNING

A guide to addressing workload issues in schools

RAISING WORKLOAD ISSUES: A MEMBER'S RIGHT AND RESPONSIBILITY

The *Understanding work in schools: the foundation of teaching and learning* report exposes the shared concerns of teachers, executive and principals of excessive administrative and compliance workload that is obstructing the focus on teaching and learning.

Consultation is the key to engaging teachers, executives and principals in decision making about their work. Dialogue about policies, procedures and other departmental requirements is important in developing effective school-based processes and prioritising teaching and learning.

Right

All teachers in school and non-school-based positions have both a right and a responsibility to exercise and assert their professional opinion.

The Department's Code of Conduct clearly sets out the right of all teachers to speak up and their right to be listened to in the workplace:

In dealing with other people, you should be able to accommodate and tolerate different opinions and perspectives, and sort out your disagreements by rational discussion.

Rational discussion presupposes that there is open communication and the freedom to voice another point of view.

Managers should be open to constructive questions or concerns regarding their instructions. They have a responsibility to respond appropriately.

Responsibility

All teachers in school and non-school-based positions have a responsibility to listen to others and to speak up about their individual and collective work.

Teachers, as professionals and educators, have a responsibility to share their opinion and raise concerns about decisions in the workplace that affect teaching and learning. This includes considering whether the time spent on an initiative is time well spent. A culture of dialogue and consultation will reduce inefficient or overly burdensome work practices that reduce the quality of teaching and learning.

It is for this reason that speaking out and listening to others is not only a right but also a responsibility of every professional. To undertake an activity or program that is believed or known to be inefficient without speaking up is an abrogation of our professional duty.

The special edition of *School Biz* (7 December 2018) describes the "schools-centred governance model" based on eight key principles:

- Students at the centre
- With schools, not to schools
- Make a difference not a change
- Better than last time, every time
- Common sense
- Do it less, do it better
- Keep it simple
- School time counts.

The stated purpose includes that "our school's time is protected" and that "every minute that our teachers, principals and schools can focus on their core business of supporting improved student outcomes is critical".

These principles should be applied to any proposed initiative or review of current work. Such reviews and initiatives themselves may be generated by teachers. The principles are particularly useful for evaluating and planning to implement any departmental requirement, and guide teachers in exercising their responsibility and right to engage in professional discussions about their work and workload.

It is when the responsibility to speak up and be listened to is circumvented that members, through their workplace representatives, have the ability to organise a union intervention to assert their right to do so.



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WORKPLACE COMMITTEES — TACKLING WORKLOAD TOGETHER

The 7 December 2018 special edition of *School Biz* commences with a statement from Secretary Mark Scott:

Within our department I have consistently stated there are two types of jobs: those helping students learn every day and the rest of us who work to support those creating great teaching and learning environments. With this in mind there is a need for those of us supporting teaching and learning to work towards increasing time for principals and teachers to focus on teaching and learning activities that directly impact student outcomes.

Many of the concerns raised in the report *Understanding work in schools: The foundation of teaching and learning* points to issues arising from excessive administrative demands on schools and insufficient support for schools, obstructing teachers from their focus on teaching and learning.

The report also identified a lack of support from the Department.

This statement and the “eight principles” of the “school-centred governance model” provide a framework to consider all work in schools.

The principles are useful for evaluating and planning, to implement any departmental policy, procedure, initiative or any other requirement where members have raised concerns that have not been resolved within the school.

Federation training for workplace committees recommends a three-step approach to resolving problems. This can be applied to problems associated with workload.

- What is wrong?
- What can we do?
- What will we do?

The role of the committee is to guide people through the process, help them find the information they need and work towards a resolution of the problem.

What is wrong?

- What are the details of the problem?
- Do the concerns relate to a particular work activity? Is the activity a requirement of the Department in a policy, procedure, guideline or initiative?
- Where are the requirements set out? Have the requirements been provided in writing to members? Is the activity useful and efficient?
- Has there been consultation around how the eight principles can be applied to the activity? Is the activity inconsistent with any of the principles?
- Is there sufficient support from the Department to the school to address the problem? How could the school be better supported?
- You may wish to discuss the problem with your Organiser.

What can we do?

- What are the possible options to deal with the problem? A range of options should be considered as to how the problem may be resolved.
- This could include changing the activity to make it more time efficient and manageable, requesting additional support and/or resources from the Department, or collectively deciding not to undertake it.
- The answers to various questions in relation to policies, procedures and resources, the application of the eight principles will assist in considering the options.
- You should discuss options with your Organiser.

What will we do?

- Seek advice from your Organiser.
- Collectively decide on the type of action that will assist in resolving the problem in a way that supports members and is supported by members. Many problems may be resolved within a school by working towards an agreed solution.
- When required, collectively demand more support and/or resources from the Department. If the problem has not been resolved, Federation Representatives should seek further advice from the Organiser in relation to options for action.

Tackling workload together

System registration and NESA inspections

Teachers, executives and principals identified “providing evidence of implementing departmental policies and procedures” and “responding to and dealing with NESA requirements in relation to curriculum, accreditation and inspections” are in the top four work activities managed in a way that is “too time consuming/cumbersome” in the “Understanding Work in Schools” survey and report . The provision of evidence also rates in the top four work activities described as “focused on compliance not teaching and learning” and “less time and resources should be spent on this work”.

The comments provided by respondents to the survey indicate concerns that excessive documentation is required to be maintained in schools by NESA. The following comments illustrate the concerns but also show that there are misunderstandings about departmental requirements and NESA processes.

- “The increasing powers of NESA to demand excessive administration and data collection (all to be uploaded on the web – so THEY can inspect it anytime / has greatly increased workload.”
- “NESA Compliance Audit has now dictated that teachers are signing, dating, evaluating and annotating in written form on programs for every single lesson – it is completely unrealistic.”

1. Why are schools being inspected by NESA?

The Department’s “Frequently Asked Questions” regarding policy implementation and system registration clarify that “the registration process applies to the government schooling system as a whole. While each government school contributes to system registration, individual schools are not registered.”

This means that the purpose of the inspection is not to verify the school’s compliance with the NESA registration of education systems requirements. The inspections are aimed at determining whether the NSW government schooling system as a whole has processes in place to meet the minimum standards for system registration that ensure compliance with NESA’s minimum standards.

What happens if NESA raises an issue about school compliance with registration requirements?

NESA focuses on NSW government schools’ compliance with registration requirements as a system. The department is responsible for responding to any systemic issues and makes changes to policies, procedures, practices and processes, where necessary.

The department provides schools with appropriate support so they can comply with any identified systemic compliance issues related to the NESA registration requirements.

At the local level, Directors, Educational Leadership are responsible for addressing any identified concerns in individual schools in their principal network.

2. Debunking myths

The Department’s website has “Frequently Asked Questions” in relation to system registration and inspections.

The following questions and answers from these FAQs address many concerns raised by members:

Are schools required to prepare evidence on all requirements in the NESAs manual?

No. The department does not require schools to prepare evidence on all requirements in the NESAs registration manual. Schools are notified about the type of evidence they need to provide.

Are schools expected to provide work samples for every student in every class?

No. For the purpose of curriculum monitoring, a minimum of three work samples, representative of student assessment is sufficient. A sample of a student workbook should also be provided to demonstrate alignment between the workbook, learning program, scope and sequence and assessment. It is important that schools have clear process and structures for discussion about teaching, learning and assessment using work samples as they assist in demonstrating a shared understanding of consistent teacher judgement.

Is there an expectation that learning programs will all be the same?

No. Each school is unique in how they meet the learning needs of their students. Schools have flexibility in how they deliver learning programs, for example, through integrated learning programs (STEM, STEAM etc.), provided that they are able to demonstrate that the minimum required hours of each of the key learning areas have been met. Learning programs are based on NESAs syllabuses and are to address each learning area in each year of schooling.

Should all schools prepare a random inspection?

No. The department does not expect schools to prepare for random inspections. NESAs considers the evidentiary materials to be made available at the inspection are those that could reasonably be expected to be available on a day-to-day basis at any school, and are consistent with the system's policies, procedures and expectations.

What happens if NESAs raises an issue about school compliance with registration requirements?

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The department provides schools with appropriate support so they can comply with any identified systemic compliance issues related to the NESAs registration requirements.

At the local level, Directors, Educational Leadership are responsible for addressing any identified concerns in individual schools in their principal network.

The [NESAs website](#) also contains information about system registration. Note the policies that will be considered in random inspections in 2019 are set out in this link.

3. Evidence of policy requirements

NSW government schools must comply with departmental policies and procedures. Following meetings with Federation about the excessive workload associated with demonstrating compliance using the A-Z tool, the Department wrote to Federation and informed schools in an email to principals on 25 June, 2018 "schools are no longer required to enter evidence of implementation in the A-Z tool in 2018".

Following further representations by Federation, the Department informed Federation that while schools must comply with policies and procedures they are not required to enter evidence of implementation on the A-Z tool. The A-Z tool has been decommissioned.

When schools consider how they maintain records of compliance with policies through implementation, monitoring and reviewing their processes, the focus should be on the eight key principles (School Biz. December, 2018)

- Students at the centre
- With schools not to schools
- Make a difference not a change
- Better than last time every time
- Common sense
- Do it less, do it better
- Keep it simple
- School time counts.

The aim should be to maintain the focus on teaching and learning rather than compliance and to ensure that the processes are not managed in a way that is too time consuming and cumbersome.

In meetings with the Department, Federation has pursued the need for further clarity around how schools can provide evidence of compliance without adopting processes that are too time consuming/ cumbersome and negatively impacts on the focus on teaching and learning.

Federation has also called on NESAs to reduce the administrative burden related to compliance to support schools focus on their core work of teaching and learning.

Tackling workload together

Learning Progressions and PLAN2

Member's comments in "Understanding work in schools – the foundation for teaching and learning" Identified major concerns around the massive workload associated with the use of PLAN2 in term 1, 2018. Federation pursued these concerns with the Minister and Department.

This resulted in the Department significantly reducing their assessment requirements in relation to Early Action for Success Schools and clarifying that the use of Learning Progressions with or without PLAN2, while encouraged, are not mandatory for all other schools.

EAFS schools

In a memorandum to principals on 12 June, the requirements for term 2, 2018 were significantly reduced. Following further meetings with Federation, the Department confirmed in a letter 14 September, 2018 that these requirements would remain unchanged in 2018 and continue in 2019.

These requirements are:

- *Monitor 5-10 students in each class from K-2 against the Learning Progressions for the 7 identified sub-elements.*
- *Ensure assessment information is entered in PLAN2 by the end of the term, noting that it is advisable to enter data in the system as you go.*

OR

- *Monitor all K-2 students against just 1 literacy and 1 numeracy sub-element.*
- *Ensure assessment information is entered in PLAN2 by the end of the term, noting that it is advisable to enter data in the system as you go.*

(Attachment 1)

Other schools

The Department has not mandated the use of Learning Progressions and/ or PLAN2 for other schools.

Use of the Learning Progressions in other Schools

The Department's increasing professional learning support and guidance offered by the Literacy and Numeracy Strategy Advisors will position schools to make informed decisions about the use of the learning progressions and PLAN2 appropriate to their context.

Principals and school leadership teams are expected to engage with their teaching staff and ensure that appropriate professional learning opportunities and time are provided to staff to build confidence in the new tools.

As their confidence grows, teachers will find the tools are useful resources that support their efforts to target teaching and monitor student learning. We continue to encourage schools to increase their use of the tools as their knowledge and understanding builds over this year and next.

(Attachment 1)

While the Department is “encouraging” schools other than EAFs schools to consider the use of Learning Progressions with or without PLAN2, it is not a policy requirement.

In the quote below the Department discusses schools making “informed decisions” about the use of the Department’s “school-centred governance model” described in School Biz (7 December 2018) outlines eight key principles.

Learning Progressions and NESAs

It should be noted that NESAs has not mandated the use of Learning Progressions. In correspondence to Federation on 31 May, 2018 NESAs (Attachment 2) wrote “NESAs has provided the National Literacy and Numeracy Learning Progressions, adapted to the NSW syllabuses, as a resource for optional school use”.

The NESAs website states:

“The progressions are used in conjunction with the syllabuses, which remain the focus for planning, programming, teaching, learning and assessment”

“The progressions do not describe what to teach; they provide a detailed map of how students become increasingly adept in particular aspects of literacy and numeracy development. Outcomes and content continue to be the focus for planning, programming, teaching, learning and assessment in relation to the NSW syllabuses.”¹

Implementing Learning Progressions and/ or PLAN2

The Department described the implementation process in correspondence on 18 September, 2018:

The National Literacy and Numeracy Learning Progressions have been made available to all schools in 2018. In NSW, this aligns with a commitment under the NSW Literacy and Numeracy Strategy 2017-2020.

The progressions have been developed as a support for teachers to identify and address the literacy and numeracy learning needs of their students.

Throughout 2018, professional learning has been provided to support teachers in understanding the Learning Progressions and consider how they can be used to support teachers in addressing literacy and numeracy within the syllabus.

The key messages provided in all communications and professional learning on the use of the Learning Progressions are that:

- *syllabuses are the focus for planning, programming, teaching, learning and assessment*
- *the literacy and numeracy progressions are tools to support teachers to make consistent judgements about students’ literacy and numeracy knowledge and progress.*

The Department will continue to provide ongoing professional learning to support teachers to use the learning progressions in conjunction with the syllabus across all key learning areas.

This professional learning is being supported by 50 new Literacy and Numeracy Strategy Advisors who provide additional literacy and/ or numeracy expertise for primary and secondary schools. These positions will continue in 2019.

¹ <http://educationstandards.nsw.edu.au/wps/portal/nesa/home>

In terms of the use of Learning Progressions, with or without PLAN2, staff should be consulted in terms of how these principles can be applied to the implementation process. Particular focus should be on whether the implementation process is adequately supported to ensure that the primary focus remains the syllabuses and teaching and learning.

Tackling workload together

HSC Monitoring

The comments provided by members in response to the “Understanding work in schools – the foundation of teaching and learning” report indicated a high level of concern about excessive workload associated with HSC monitoring – in particular monitoring folders. The survey identified that in many schools these procedures were “managed in a way that was too time consuming and cumbersome”.

These comments reflect teacher concerns:

- “administrative tasks and online reporting of data and other systems including HSC reporting folders has led to a large increase in workload for administrative duties which unfortunately take time away from lesson preparation”;
- “HSC monitoring folders have to be maintained in a highly prescriptive manner, the hours involved in so doing being themselves undocumented”; and,
- “the workload associated with HSC monitoring folders take valuable time away from lesson preparation”.

Federation pursued these concerns with the Department. We called for more clarity around legislative requirements and more focus on the procedures being negotiated with staff.

This resulted in a revision of the HSC monitoring procedures and associated material. The 2019 HSC Monitoring procedures state:

*This document describes what schools ‘must’ and ‘should’ do to comply with NESA’s requirements for HSC credentialing. It provides **guidance to assist senior executive, head teachers and teachers when consulting to develop whole school negotiated processes and procedures to monitor the requirements for Year 11 and Year 12 courses. School processes should be time efficient and managed to support teachers, students and families.** Schools may refer to the document ‘Guidance on HSC monitoring procedures’ for further assistance and suggestions.¹*

Where school processes for HSC monitoring are identified as being too time consuming and cumbersome, workplace committees should support members in the consultation and negotiation needed to review the procedures. The discussion should focus on the new NSW Monitoring Procedures, and the ‘Guidance on HSC monitoring procedures’ material. (Attachment 1)

Specific responsibilities for consultation are set out in Guidance on HSC monitoring procedures:

- *Senior Executive consult with head teachers and teachers to develop explicit, consistent, systematic and clearly articulated negotiated whole-school processes that align with the policy standards and NESA requirements for HSC credentialing, and staff and students’ needs, including students with disability. Support teachers and head teachers to implementing the schools processes for the delivery and monitoring of HSC courses*
- *Head Teachers engage in and contribute to consultations and implement, with appropriate support, the negotiated school processes and procedures, including record keeping*
- *Teachers engage in and contribute to consultations to develop negotiated whole school processes and procedures.²*

¹ <https://education.nsw.gov.au/teaching-and-learning/student-assessment/stage6#HSC1>

² As above

The consultation process should include consideration of how current procedures can be made more time efficient and manageable for staff and students. The discussion should include a focus on the eight key principles identified by the Department including in particular:

- students at the centre
- make a difference not a change
- better than last time every time
- do it less, do it better
- keep it simple
- school time counts

The “Guidance on HSC monitoring” (Attachment 1) also addresses concerns raised by members about excessive time spent on duplicating records. It states:

A list of records should be kept centrally or in faculty, with all records securely located, accessible to the school executive and regularly backed up. The records may be kept centrally or in faculties in a folder that is readily accessible, but needless duplication should be avoided. The list of records may provide links to web based records (such as NESA documents) or refer to the location of master records, such as course based attendance (e.g. available through the school’s electronic systems) to avoid inefficient duplication or unnecessary creation of hard copies. The list and associated records will support the teaching of Year 11 and Year 12 courses in instances of unexpected or prolonged teacher absences or other misadventure.

The Guidance material also states the responsibility of “Senior Executive to support teachers and head teachers in implementing the schools processes for delivery and monitoring of HSC courses”. The aim of revising school-based HSC monitoring procedures should be to minimise workload demands while meeting requirements. Most importantly, the focus should be on supporting HSC students rather than creating excessive documentation.

The consultation around the development of school-based procedures should include consideration of relevant administrative and other support.

ROSA

Members have raised similar concerns around procedures for monitoring ROSA including keeping extensive folders of documents.

The legislative and other requirements for ROSA are not as complex or detailed as for the HSC. These requirements are set out in a Memorandum to Principals with a number of attachments <https://education.nsw.gov.au/teaching-and-learning/student-assessment/stage6> (go to DET, teaching and learning Stage 6).

Federation believes that the development of school-based ROSA monitoring requirements should be based on the “Curriculum, planning, programming, assessing and reporting to parents K-12 policy” in being “time efficient and manageable”. The processes for ROSA should be consistent with the eight key principles in the same way as the HSC procedures. If members are concerned about lack of consultation or negotiation they may wish to discuss the concerns with the principal and/or the Federation Workplace Committee in the first instance. It may be helpful to utilise the Federation Guide.

Tackling workload together

Reporting to parents

The final report “Understanding work in schools – the foundation for teaching and learning” revealed that “reporting to parents and care givers” was listed first in the category of activities described by the majority of respondents as “focussed on compliance not teaching and learning”. This suggests the need for a review of reporting processes within schools and by the Department. Federation has pursued these concerns with the Department indicating that the focus on compliance undermines the purpose of the report in providing information to parents.

School reporting processes differ from school to school. Many comments made by respondents to the survey pointed to time consuming and cumbersome processes that required teacher comments to be checked and revised multiple times. Comments indicated that these processes resulted in teachers writing comments 10 weeks or more before the reports were due.

What does the policy state?

The “[Curriculum – planning, programming, assessing and reporting to parents K-12 policy](#)” sets out the requirements for reporting to parents. These include providing parents/carers “formal and informal opportunities to receive information about and discuss their child’s learning”.

The policy states that reports to parents should be:

- *“based on the Department’s policy*
- *time efficient and manageable*
- *developed in consultation with parents carers and teachers”*¹

The policy standards set out the minimum requirements for reports.

It is important to note that the Policy Standards require comments be provided on each KLA or subject. There is no requirement for the comments to have a predetermined number of words.

There is a requirement that the comments identify areas of strength and areas for further development. There is no predetermined word limit.

Addressing concerns about school reports

Members at a school should consider how to apply the eight key principles and the policy to review and change-based procedures to become more “time efficient and manageable” for staff consistent with the Departments’ policy.

1. Students at the centre
2. With schools not to schools
3. Make a difference not a change
4. Better than last time every time
5. Common sense
6. Do it less, do it better
7. Keep it simple
8. School time counts.

¹ <https://education.nsw.gov.au/policy-library/policies/curriculum-planning-and-programming-assessing-and-reporting-to-parents-k-12>

Questions that could be considered should include:

- Do the reports place “students at the centre” by providing relevant and current information to parents on their child’s learning?
- Are the processes for writing comments on reports consistent with the principles “common sense”, “do it less do it better”, “keep it simple”, “school time counts”?
- Are the reporting processes time efficient and manageable for staff?

Members could address some concerns by considering how any excessive workload demands associated with school reports could be reduced or minimised or identify what additional support is necessary. Rather than changing each school’s current reporting format it may be possible to make some changes that address these concerns.

Strategies to address the concerns might include developing an agreed style guide or helpful hints for writing comments. This process should reduce the need for repeated revision and rewriting of comments. Writing reports at the beginning of a school term 7-10 weeks prior to being sent to parents may undermine the currency and value of the report. Reviewing current processes should focus on processes and support for teachers to ensure that the processes provide timely information without creating an unworkable workload for teachers, executives and principals and obstructing their focus on supporting students.