

FEEDBACK FORM

Consultation Process

Comments on the proposed amendments to the Senior Secondary Assessment Board of South Australia (SSABSA) and consequential amendments to the Education Act are invited from all interested parties, including parents, students, staff, governing councils, service providers, government agencies, training bodies, unions and the wider community.

Feedback received will inform the development of a draft Bill to be introduced into the South Australian Parliament in 2007 to enact legislation that will underpin the future South Australian Certificate of Education.

Please return this feedback form by the close of business on **Friday 2 March 2007** by post to:

**SSABSA Act
Legislation Reform Unit
Minister for Education and Children's Services
GPO Box 778
ADELAIDE SA 5001**

* Please add additional pages as necessary

Are you a:

- Parent
- Community Member
- Student
- Teacher
- School/Preschool Staff Member
- Academic
- Principal/Director of a School/Preschool
- Government Agency Representative
- Non-Government Agency Representative
- Other: _____

You are from a:

- Government School
- Government Preschool
- Non-Government Preschool
- Non-Government School
- Schooling Authority
- Children's Services Association
- Government Department
- Statutory Board
- Parent Association
- Professional Association
- Employee Association
- Employer Association
- Other: _____

(Optional)

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Organisation (if applicable)	SAASSO

Please tick if you would like this to remain confidential

REFORM 1 – PRINCIPLES

What are your views on the proposed core principles to be included in the amended Act? Are there any additional principles which could be considered?

RESPONSE:

The core principles are admirable and stresses the need for a holistic community approach to education.

Students, teachers, education providers, employers, tertiary centres, regulation bodies – all are cited as valuable contributors to education ... everyone except parents.

REFORM 2 – SIZE AND COMPOSITION OF THE NEW SACE BOARD

What are your views on the proposed size and composition of the new SACE Board?

RESPONSE:

Reducing the size of the Board is claimed to improve efficiency – however, other than a statement that this is practice in some other arenas, no details are offered as to how a smaller Board will achieve this.

Most disappointing is the proposal to remove all direct input from stakeholders into the appointment process. The review report cites the fact that stakeholders may change over time as the only reason for eliminating them from the process.

The original stakeholders included in the current act, still exist and are still vital members of the South Australian educational landscape. Given the longevity of each of the stakeholders and the relatively static basic framework of education, it is very difficult to imagine a time when this group will change so significantly as to have any effect on the Board appointment process, requiring a legislative change.

It is highly unlikely that the University of Adelaide or Flinders University, SAASSO (which has existed for close to 90 years), The Independent or Catholic Schools Associations or the United Trades and Labor Council will cease to exist any time soon, or be replaced by competing organizations.

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RESPONSE:

If the possibility that stakeholders may change over time is the only reason for completely removing them from the appointment process – it is not a good enough reason.

It is more likely the current government will be replaced before any of the current stakeholders.

REFORM 3 – APPOINTMENT OF THE NEW SACE BOARD

What are your views on the proposed appointment of a merit based Board, including a Chairperson and deputy Chairperson?

RESPONSE:

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RESPONSE:

The report speaks at length as to the modern collaborative nature of education and modern principles of governance. It is disappointing, therefore, that all power over the makeup of the Board will now be centralized with the Minister. Again, no reasonable explanation of why stakeholders should be completely removed from the process is offered.

It is stated that ‘other’ forms of consultation are possible. However, none of these ‘other’ forms will be legislated and there will be no requirement for the current Minister or any of her successors to pay heed to any input from any stakeholder. ‘Consultation’ in a fine idea, but any Minister could simply dismiss this process as tokenism.

It is prescribed that the Minister is required to ‘canvass widely’, however, there is no provision that the appointed Board must reflect this ‘wide canvassing’. The current Minister or any of her successors could ‘canvas widely’ and then still appoint 12 people from the same institution, without offending the legislation.

In an era of local governance in our schools and an increased focus on cooperation to develop our state, it is a retrograde step to centralize the appointment of such an influential Board in the hands of one person, to the exclusion of the hundreds of thousands of South Australians directly involved in the education of our children.

REFORM 4 – THE CHIEF EXECUTIVE

What are your views on the proposed amendments to appoint a Chief Executive who is not a member of the Board?

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RESPONSE:

REFORM 5 – FUNCTIONS OF THE NEW SACE BOARD

What are your views on the proposed enhanced functions of the new SACE Board?

RESPONSE

REFORM 6 – LIMITED POWER OF MINISTERIAL DIRECTION

What are your views on the proposed new limited Ministerial Direction provision?

RESPONSE:

A functioning relationship between the Board and the Minister is vital, however, the legislative language does not attempt to define what ‘limited power to direct the Board’ means. Given that the other proposed amendments to the legislation gives a Minister complete control over the appointment of the Board, further power to then ‘direct’ the Board seems a disquieting centralization of control in one person – a representative of the government of the day.

REFORM 7 – ANNUAL REPORTING

What are your views on the proposed enhanced reporting requirements?

RESPONSE:

Increased reporting is always preferred and it is pleasing that stakeholders are mentioned, but again, the proposed amendment only stipulates that the Board reports on how it has worked with other bodies – there is no prescription as to the level or quality of this engagement with stakeholders

REFORM 8 – RELEASE OF DATA

What are your views on the proposed enhanced data release provisions?

RESPONSE:

The report recommends an advisory group be installed to manage the release of data. The proposed amendment does not reflect this. Many stakeholders, not just the Minister, could benefit from access to data from the Board, but stakeholders, again, are not cited in the legislative language. The amendment will give the Minister and ‘appropriate’ authorities access, but it is silent on where stakeholders fit in this framework.

REFORM 9 – REVIEW OF PERFORMANCE

What are your views on the proposed enhanced performance review provisions?

RESPONSE:

REFORM 10 – DEFINITIONS

What are your views on the proposed expanded definition of senior secondary education?

RESPONSE:

REFORM 11 – ROLE OF THE DIRECTOR- GENERAL IN CURRICULUM

What are your views on the proposed additional requirement to be inserted in the Education Act regarding the Director-General concerning curriculum?

RESPONSE:

REFORM 12 – RAISING THE SCHOOL LEAVING AGE

What are your views on the proposed changes to the school leaving age to be implemented by 2010?

RESPONSE:

While details of the proposal need to be offered, in principle, increasing the school leaving age fits in well with the new SACE.

ADDITIONAL COMMENTS

While a review of the practices and processes of the Board is warranted, it is most disappointing that stakeholders have been completely removed from the formal processes of the Board. As a result, there is no guarantee that future Boards will reflect a comprehensive view of the education fraternity.

As the representative of South Australia's parents, who have a right to detailed involvement in their children's education, SAASSO is distressed that parent representation on the Board is, apparently, no longer required.

South Australia operates under a system of local governance, with a mandated majority of parents and yet, on this most vital education board, there is no longer any guarantee that the voice of parents will be listened to.

In fact, the word 'parent' is not used once in any of the 12 planned reforms (in either the legislation or the supporting notes from the Review Report), while the Minister is referred to more than 30 times.

