

AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS (ACTA)



**SUBMISSION TO
THE PRODUCTIVITY COMMISSION
REVIEW OF THE NATIONAL SCHOOL REFORM AGREEMENT**

July 2022

Abbreviations

AC	Australian Curriculum
AERO	Australian Education Research Organisation
ACARA	Australian Curriculum and Assessment Authority
ACTA	Australian Council of TESOL Associations
ANAO	Australian National Audit Office
AITSL	Australian Institute for Teaching and School Leadership
ATWD	Australian Teacher Workforce Data Collection
DESE	(Commonwealth) Department of Education, Skills and Training
EAL	English as an additional language
EAL/D	English as an additional language or dialect
ELP	(Low) English language proficiency (loading)
ITE	Initial Teacher Education
LBOTE	Language Background Other Than English
LLND	Language, Literacy Numeracy and Digital literacy
NAPLAN	National Assessment Program – literacy and numeracy
NSRA	National Schools Reform Agreement
NPI	National (Schools Reform Agreement) Policy Initiative/s
NSRB	National School Resourcing Board
QITE	Quality Initial Teacher Education (review)
TESOL	Teaching English to speakers of other languages
TRA	Teacher Regulatory Authority
VET	Vocational Education and Training

1. Introduction

The Australian Council of TESOL Associations (ACTA) is the peak professional body for TESOL (Teaching English to Speakers of Other Languages) educators in pre-school, school and adult settings. It comprises representatives from state and territory TESOL associations, whose members include teachers, consultants and curriculum developers and researchers in the field of English as an Additional Language or Dialect (EAL/D).

As a professional body whose key mission is advocating for the interests of students who are learning English as their second or additional language, ACTA welcomes the opportunity to provide advice on the Productivity Commission's Review of the National Schools Reform Agreement.

Our submission focuses on remedying the unwarranted exclusion of English language learners from national education policy and Australia's school reform agenda. Any reform agenda that has as its overarching objective to provide high quality and equitable education for all students must include initiatives and measures that address the particular needs, outcomes, targets and sub-outcomes crucial to the progress of its equity student cohorts.

Australian schools have become increasingly linguistically diverse as a result of the nation's growing indigenous population and its ongoing migration and humanitarian programs. Now more than ever, the inclusion of specific initiatives to ensure educational equity and excellence for the full cohort of English language learners should be an ongoing priority for Australian education.

2. The EAL/D learner equity cohort

EAL/D learners are school-aged students who have language backgrounds other than English *and* who are learning English as their second or additional language at school. The EAL/D target group encompasses students from both First Nations and migrant backgrounds who are functioning at various levels along their pathway to peer-equivalent English language proficiency.

Migrant background students include newly arrived and Australian-born students, including refugees and international students. Their profiles can be summarised as follows:

- students beginning school with minimal or no exposure to English, whether born overseas or in Australia to parents with language backgrounds other than English
- students with little or no previous formal schooling in any country, who are beginning school in Australia
- students with disrupted educational backgrounds, who are beginning school in Australia
- students starting school in Australia with schooling equivalent to that of their Australian-born chronological peers
- students with disrupted education in one or more countries returning to Australia.

These students may enter Australian schooling as new arrivals at any year from Kindergarten to Year 12, be enrolled across all years of schooling and have varying levels of English language proficiency. EAL/D learners are in the process of becoming bilingual or multilingual users of

English. It is important to recognise that they enter the school system with *existing* language skills and cultural and cognitive abilities, which contribute a range of linguistic and cultural resources on which to build their English language and curriculum learning.

An estimated 26,600 First Nations school students speak Australian Indigenous languages. These include traditional languages, mixed languages, creoles and English-based dialects. Most of these speakers live in remote areas with minimal contact with English and are learning Standard Australian English as their second or additional language or dialect at school.¹ The crucial place of their languages in their lives and communities – and therefore their engagement with school and the curriculum – has been consistently ignored in policy, plans and reviews of Indigenous education.

It is estimated that currently over 600,000 EAL/D learners need English language support in schools throughout Australia.² This number reflects the substantial increase in students from migrant and refugee backgrounds needing EAL/D teaching support in Australian schools resulting from Australia's high and sustained immigration levels over the decade before the pandemic. Net overseas migration rose from 232,800 in 2006/7 to 262,490 in 2016/17, an increase of 12.7 per cent³, while Australia's overseas born population grew from 4,063,954 in 2001 to 6,150,051 in 2016, an increase of 151 per cent.⁴ ABS Census data indicate the number of school-aged respondents (0 - 19 years of age) who reported speaking 'not well' or 'not at all' increased from 117,158 in 2006 to 190,462 in 2016, an increase of 62 per cent.⁵ This trend is confirmed by the two government education systems with the largest number of EAL/D students. The NSW Department of Education reported a 114 per cent increase in the number of EAL/D students (from 91,706 to 196,669) between 2009 and 2019, while the Victorian Department of Education and Training reported 69 per cent growth in EAL/D students (from 47,6254 to 80,5165) over the same period.

Despite the nature and scale of this linguistic demography in Australian schools, English language learners have disappeared as a priority equity cohort in last two national education declarations – the 2008 Melbourne Declaration and the 2019 Alice Springs Declaration. For First Nations students, successive Closing the Gap reports document the repeated failure to meet two key educational targets – school attendance, and English literacy and numeracy achievement. The failure is greatest in remote areas and worst in the Northern Territory, where 30 per cent of the student population are Indigenous and 25 per cent live in very remote areas.

Despite the evidence of needs, the NSRA does not identify English language learners as priority equity cohort. It therefore excludes the possibility of any national educational policy response to the English language and literacy learning needs of Australia's new arrivals, refugees, migrants, and Indigenous students.

¹ <https://tesol.org.au/how-many-english-as-an-additional-language-or-dialect-eal-d-learners-are-there-in-australian-schools/>

² <https://tesol.org.au/how-many-english-as-an-additional-language-or-dialect-eal-d-learners-are-there-in-australian-schools/>

³ https://parlinfo.aph.gov.au/parlInfo/download/library/prspub/6377182/upload_binary/6377182.pdf

⁴ https://parlinfo.aph.gov.au/parlInfo/download/library/prspub/6377182/upload_binary/6377182.pdf

⁵ ABS Census 2006, 2016 Counting of Persons Place of Enumeration AGE by proficiency in spoken English

Australia's cultural and linguistic diversity means that EAL/D learners will continue to be a significant component of the student population. In the coming decade, immigration will be an increasing proportion of Australia's population growth⁶ while international crises will continue to put pressure on Australia's refugee and humanitarian intakes⁷. Meanwhile, the failure to acknowledge, much less address, the needs of Indigenous EAL/D learners will continue to undermine Closing the Gap initiatives. To meet this demographic and educational challenge, it is essential that the next NSRA includes a national education response to English language learners as priority equity cohort.

3. English Proficiency: a crucial driver of EAL/D student learning outcomes

English language proficiency is crucial to EAL/D student learning outcomes in school. EAL/D learners' academic achievement, engagement and skill acquisition in Australia's English-medium curriculum is contingent on the acquisition and development of the spoken English that is necessary for social interaction and is the foundation on which academic literacy skills are built.

While EAL/D learners come from different socioeconomic backgrounds, English language proficiency is the prime factor that determines the learning needs and potential educational disadvantage of this group. The relative educational disadvantage for refugee students has been estimated as having a negative impact on performance of -0.463 (or 3 quarters of a performance band on NAPLAN), comparable with Aboriginal and Torres Strait Islander student disadvantage, and -1.807 (or 3 performance bands on NAPLAN) for a newly arrived refugee student.⁸

Successive studies have confirmed that for EAL/D learners at school, learning English typically takes about two years to achieve basic fluency in spoken English, and a minimum of five to seven years to develop the English language and literacy needed to close the gap in academic performance with their English-speaking peers.⁹ These two aspects of English language proficiency have been called *Basic Interpersonal Communication Skills* (BICS) and *Cognitive Academic Language Proficiency* (CALP) or "academic English".¹⁰ The key factor determining the time taken is the level of literacy which students have developed in their home language. Refugee and other students with disrupted education and little or no literacy in their first language can take between seven to twelve years to develop the level of English needed to achieve academic parity with their English-speaking peers.¹¹

⁶ Cully, M. & Pejoski, L. (2012) Australia unbound? Migration, openness and population futures. In; *A Greater Australia: Population, policies and governance* Committee for Economic Development. p.70.

⁷ For example, Commonwealth Government's recent decision to accept an additional intake of Syrian refugee families and to increase the number of humanitarian places from 13,500 to 20,000.

⁸ Nous Group (2011) *Schooling Challenges and Opportunities: A Report for the Review of Funding for Schooling* Panel. p. 73.

Gonski Report, (2011) p.119 at: <https://docs.education.gov.au/system/files/doc/other/review-of-funding-for-schooling-final-report-dec-2011.pdf>

⁹ Cummins, J. (1991). Interdependence of first and second language proficiency in bilingual children, in E. Bialystok, *Language processing in bilingual children*, Cambridge: CUP.

Thomas, W. P., & Collier, V. P. (2002). *A national study of school effectiveness for language minority students' long-term academic achievement*.

¹⁰ Cummins, J. (2008). BICS and CALP: Empirical and theoretical status of the distinction. In *Encyclopedia of Language and Education* (pp. 487-499). Springer US.

¹¹ Collier, V. (1989). How Long? A synthesis of research on academic achievement in a second language, *TESOL Quarterly*, 23(3), 509-531.

For English language learners, therefore, development of proficiency in spoken and academic English is a key driver and key measure of developing English literacy skills.

Recommendation 1

That the Productivity Commission recommend EAL/D learners be identified as a priority equity cohort warranting national collaborative effort through the reform initiatives in the new NSRA.

4. Assessing the appropriateness of the NSRA outcomes and sub-outcomes

Although English proficiency is a crucial driver of EAL/D learners' schooling outcomes, they are entirely absent from NSRA metrics. As a result, the sub-outcomes of the national measures fail to identify the academic performance achievement, growth or progress of the English language learner cohort and therefore the relevant performance and improvement metric for this equity cohort.

For example, lowered and increased proportions of equity cohorts in the respective bottom and top two NAPLAN performance bands in years 3, 5, 7 and 9 fail to capture the substantial progress of newly-arrived English language learners entering school in these years or the significant underachievement of ongoing English language learners across these years. They are inappropriate sub-outcome metrics that are unable to measure key English language drivers for this equity cohort, and therefore identify their achievement in relation to NSRA outcomes, targets and objectives.

An appropriate sub-outcome metric for the English language learner cohort could be constructed along the lines of 'increased number and proportion of EAL/D learners who make progress against a national English language proficiency measure within a school year.'

Recommendation 2

That the Productivity Commission recommend inclusion of a specific sub-outcome metric focusing on development of English language proficiency for the EAL/D learner equity cohort in the new NSRA.

5. Assessing the appropriateness and effectiveness of the National Policy Initiatives

The National Policy Initiatives (NPI) in the current National Schools Reform Agreement specify three Reform Directions:

- A. Supporting students, student learning and student achievement
- B. Supporting teaching, school leadership and school improvement
- C. Enhancing the national evidence base.

These Directions provide a comprehensive, perennial framework for identification and implementation of a wide range of school reform initiatives. They are robust reform categories and should therefore be retained.

Hakuta, K. (2000). How long does it take English learners to attain proficiency. *University of California Linguistic Minority Research Institute*.

Demie, F. (2013). English as an additional language pupils: how long does it take to acquire English fluency? *Language and Education*, 27(1), 59-69.

The current NPIs based on these Directions should form the ongoing basis of the next NSRA. However, current Initiatives are specific priority projects of uneven duration and dubious completion. Most are regarded as completed simply on publication of documents with no consideration of their implementation, impact or effectiveness (see: Ai, Aii, Aiii, Bi, Bii). As has been the case in various national collaborative education reforms, key national initiatives can be undermined or overturned at the crucial implementation stage. This problem is compounded by the glacial pace of developing the national evidence base. Implementation of NPIs should therefore not be considered as an after-thought but included as an essential stage in describing each Initiative to ensure that they are ‘bedded down’ and fully operational within the national education system.

A key issue concerning NPI appropriateness and effectiveness is their lack of articulation with the outcome to ‘improve academic achievement for all students, including priority equity cohorts.’ Although each of the Initiatives has major implications for EAL/D learners, they are not identified. Consequently, the benefits of the reforms do not flow to this equity group. The policy void created by these omissions is comprehensive. To fill this void, ACTA has developed a *National Roadmap for EAL/D Education in Schools* through twelve key Actions that are aligned to the national Directions and Initiatives of the *National Schools Reform Agreement* (see **Appendix A**). The Roadmap proposals are framed for implementation over a three-year time-frame that complements the NPI in the current *National Schools Reform Agreement* and informs the NPI of the 2024-2028 *National Schools Reform Agreement*. **Appendix B** shows the articulation of *National EAL/D Roadmap* actions with the NPI of the current NSRA.

In short, the ACTA *National EAL/D Roadmap* highlights the EAL/D equity gaps in the current NPIs and documents an unfinished national reform agenda for EAL/D education. As they stand, the NPI are not effective for the EAL/D learner cohort. More tailored strategies will be required to ensure the NPI of the new NSRA are inclusive of this cohort.

Recommendation 3

That the Productivity Commission recommends continued use of the three broad directions of the NPI in the new NSRA.

Recommendation 4

That the Productivity Commission recommends continuation of initiatives in the new NSRA to ensure effective implementation and identifies specific related projects for equity cohorts where appropriate or necessary.

Recommendation 5

That the Productivity Commission recommends that the new NSRA identify NPI-related specific projects for the EAL/D learner equity cohort, which are informed by the twelve Actions specified in the ACTA National EAL/D Roadmap.

6. Assessing the National Measurement Framework for Schooling

The need for a national English language proficiency measure

Although EAL/D learners have comprised a significant proportion of the school population for over fifty years, Australia still has no nationally agreed measure for identifying or reporting on

their English language proficiency achievement or progress.¹² This gap in the nation's education evidence base prevents national identification, effective and accountable needs-based funding, and relevant, accurate reporting on provision and outcomes for this equity cohort.

The equity strand of the National Measurement Framework for Schooling relies on language background as a broad 'diversity' indicator but it does not capture the English language proficiency levels that would enable identification of EAL/D learners within this group. NAPLAN reporting is distorted and misleading in regard to literacy and numeracy outcomes for Indigenous and migrant background EAL/D learners because it takes no account of their English proficiency levels, much less the relationship between English literacy, English oracy and fluency in other languages or dialects.¹³ Consequently, the National Measurement Framework for Schooling is unable to provide a relevant, reliable or complete picture of diverse student achievement, engagement and skills acquisition and progress against the outcomes of the NSRA.

The lack of an appropriate English language proficiency measure has far-reaching consequences for effective and equitable education policy and practice. It both perpetuates the 'invisibility' of the EAL/D learners and mis-labels them as failing learners. EAL/D students who are developing CALP are frequently misidentified as having English literacy or special education needs because they present with native-like conversational fluency but display gaps in academic, written English.¹⁴

Overall, the failure to accurately identify English language learners prevents the national policy planning, provision, monitoring, evaluation and research that would effectively promote their successful participation in Australian education and training and contribution to our multicultural society.

LBOTE as a proxy measure for English language proficiency

English language learners are a subgroup of the larger population of students from language backgrounds other than English (LBOTE). However, in the absence of a nationally consistent and agreed basis measure of English language proficiency, LBOTE identification has become the de facto and misleading proxy means of identifying these learners.

The *Final Report for the Review of the Funding for Schooling* (known as the Gonski report) identified English language proficiency as a key disadvantage factor and recommended a per student loading for limited English language proficiency as part of a schooling resource standard.¹⁵ It recommended funding for EAL/D students be based on their assessed levels of English language proficiency. However, a survey conducted in 2011 of all state and territory

¹² ACTA submission to the Productivity Commission's *Inquiry on the National Education Evidence Base* at: http://www.pc.gov.au/_data/assets/pdf_file/0004/208903/subdr120-education-evidence.pdf

ACTA submission to the *Review to Achieve Educational Excellence in Australian Schools* at: https://tesol.org.au/wpcontent/uploads/2019/01/580_ACTA_full_submission_to_Gonski_Review.pdf

¹³ Most obviously, a student may be highly numerate but simply unable to understand a test question in English.

¹⁴ Lo Bianco, J. (1998). ESL ... Is it migrant literacy? ... Is it history? *Australian Language Matters*, 6(2), 1 and 6-7.

Cummins, J (1984a) Wanted: a theoretical framework for relating language proficiency to academic achievement among bilingual students. C Rivera(ed) *Language proficiency and academic achievement*. Clevedon: Multilingual Matters.

¹⁵ Gonski Report, (2011) at: <https://docs.education.gov.au/system/files/doc/other/review-of-funding-for-schooling-final-report-dec-2011.pdf>

government school systems showed that no consistent measure was currently available for identifying or reporting English language proficiency of EAL/D students across jurisdictions.¹⁶

As an interim measure, the Australian Curriculum, Assessment and Reporting Authority (ACARA) developed a disadvantaged LBOTE variable to capture EAL/D student need. This measure was incorporated in the calculation of the Index of Community Socio-Educational Advantage (ICSEA) (ACARA 2011). The variable is defined as the percentage of the parents in the school community who are both LBOTE and completed a school education of Year 9 equivalent or below. As it was the only nationally consistent measure available at the time, the Gonski Report recommended that the loading for limited English Language Proficiency (ELP) be based on the 'Disadvantaged LBOTE (Language Background Other Than English)' measure established by the Australian Curriculum, Assessment and Reporting Authority (ACARA).¹⁷

The inadequacy of the current LBOTE measure

Currently, 'disadvantaged LBOTE' is used as the measure for allocating ESL funding, supposedly in line with the Gonski proposal for an English language proficiency loading. This measure and consequent reporting arrangements have resulted in the performance of EAL/D learners being hidden within the performance of LBOTE students reported on national literacy and numeracy tests. The range of literacy and numeracy performance of the LBOTE group reflects the diverse socioeconomic characteristics of the group and consequently misrepresents the performance of the EAL/D learner subgroup.¹⁸

Reporting of high performing LBOTE students (who may be mother tongue monolingual English speakers or EAL/D learners with high English proficiency) gives false assurance that there is no English language factors hindering student achievement. Conversely, the EAL/D learning needs of low performing LBOTE students are masked if they are seen as an undifferentiated low SES disadvantaged subgroup.

The 'disadvantaged LBOTE' measure has been shown to be grossly inadequate in determining EAL/D learning needs. In 2013, an analysis by the NSW Department of Education and Communities (DEC) concluded that the 'disadvantaged LBOTE' measure is not a reliable proxy for English language learning needs, because it is essentially a low SES measure, rather than an indicator of low English language proficiency, and does not identify the cohort which actually requires English language support.¹⁹ The analysis found that the disadvantaged LBOTE measure

¹⁶ At the request of the Australian Education, Early Childhood Development and Youth Affairs Senior Officials Committee (AEEYSOC) and the Ministerial Council for Immigration and Multicultural Affairs (MCIMA), the Schools Data Sub Group conducted the survey during July and August 2011 on funding for ESL/EAL/D student support across States and Territories.

¹⁷ However, the report noted that State systems were better able to measure ELP through their own enrolment processes, annual ESL surveys and classroom assessments (p.118). Nevertheless, disadvantaged LBOTE was the measure included in the report and in subsequent modelling because it was the only available nationally consistent measure.

¹⁸ Lingard, B., Creagh, S., & Vass, G. (2012). Education policy as numbers: Data categories and two Australian cases of misrecognition. *Journal of Education Policy*, 27(3), 315-333.

Creagh, S. (2014). A critical analysis of problems with the LBOTE category on the NAPLaN test. *The Australian Educational Researcher*, 41(1), 1-23.

Creagh, S. (2016). 'Language Background Other Than English': a problem NAPLaN test category for Australian students of refugee background. *Race Ethnicity and Education*, 19(2), 252-273.

¹⁹ Statistics Unit, Centre for Educational Statistics and Evaluation, NSW DEC. (2013). *Improvements and Alternatives to the Disadvantaged LBOTE Measure Report* at:

not only significantly underestimates the size of the cohort needing support but it also does not capture the right students and should not be used to identify the ELP loading for EAL/D learners. These conclusions were reached by comparing disadvantaged LBOTE students to those with low ELP as gauged by the NSW DEC measure of English as a Second Language (ESL).

The report concluded that the significant misalignment between 'disadvantaged LBOTE' and English language proficiency results in a misdirection of available targeted funding. It estimated that using 'disadvantaged LBOTE' as a proxy for English language proficiency would mean that 74.7 per cent of the \$100 million earmarked by Gonski for limited English language proficiency would be misdirected to students who do not require EAL/D support.

The LBOTE measure is clearly not fit for the purpose of national identification and reporting on students from language backgrounds other than English who have English language learning needs, nor for the purpose of allocating national targeted funding to state and territory education systems based on English language proficiency need.

Potential of the ACARA EAL/D Learning Progression as a national English language proficiency measure

The *EAL/D Learning Progression* was developed by ACARA in 2011 as part of the Australian Curriculum to support non-specialist teachers to understand the broad phases of English language learning, monitor EAL/D students' linguistic progression, and inform teaching and learning.²⁰

The *Progression* was informed by input from experts across jurisdictions and academia and existing state EAL/D assessment tools (notably, the CURASS ESL Scales and the NLLIA ESL Bandscales). It describes English language development typical of EAL/D learners in Australian schools and includes broad descriptions of four phases in English language learning (Beginning, Emerging, Developing and Consolidating). More detailed descriptors are provided for each of the four modes of language (listening, speaking, reading and writing). These are also differentiated by three stages of schooling (Kindergarten-Year 2, Years 3-6, Years 7-10).

It allows reporting on English language proficiency that makes visible the language needs of 'invisible' EAL/D learners and could identify EAL/D learners as a subgroup of the LBOTE group from the 'ground up'. It has the potential to be used at school, system, jurisdiction and national levels:

- to identify the EAL/D learner target group
- to identify English language learning support needs
- to analyse and report EAL/D learners' NAPLAN performance
- as an additional indicator of educational disadvantage in the calculation of ICSEA (to replacing the disadvantaged LBOTE measure).

http://www.cese.nsw.gov.au/images/stories/PDF/Improvements_and_alternatives_to_the_Disadvantaged_LBOTE_measure.pdf)

²⁰ ACARA (2014). *English as an Additional Language or Dialect: Teacher Resource. EAL/D Learning progression*. ACARA: Canberra at: http://www.acara.edu.au/resources/EALD_Learning_Progression_revised_February_2014.pdf

These claims are supported by a trial conducted by the NSW Department of Education in 2013.²¹ The trial investigated the validity and reliability of the *EAL/D Learning Progression* in identifying EAL learning needs in relation to resourcing. It was found that the *Progression* enables teachers to make consistent judgements of English language proficiency across all four modes, that it provides a balanced and accurate reflection of student English language development, and that it could be used as a single measure of English proficiency in allocating the English language proficiency loading.²²

In 2019, ACARA undertook national collaborative work to develop a nationally agreed assessment framework based on the *EAL/D Learning Progression*. However, as a consequence of the dissolution of COAG, the project was discontinued in February 2021. (See Action 10 of the ACTA National EAL/D Roadmap).

A nationally consistent approach to identifying the English language learning needs, achievement and progress of students in our multilingual classrooms is long overdue. Adoption and implementation of an English language proficiency measure as part of the National Measurement Framework for Schooling represents key ‘unfinished business’ in Australia’s education reform agenda.

Recommendation 6

That the Productivity Commission recommend that an English language proficiency measure be included as a performance indicator for the EAL/D equity cohort within the National Measurement Framework for Schooling and implemented as the relevant performance indicator for this cohort in the new NSRA.

Recommendation 7

That the Productivity Commission recommend completion of the national collaborative data project implementing a nationally agreed measure and method of reporting EAL/D learners’ English language proficiency.

²¹ Statistics Unit, Centre for Educational Statistics and Evaluation, NSW DEC. (2013). NSW Trial of the reliability and validity of the EAL/D Learning Progression, DEC: Sydney. at: <http://www.dec.nsw.gov.au/documents/15060385/15385042/Report26Februaryfinal.pdf>

²² The report on the trial distinguished between using the *Progression* as the basis for allocating the English Proficiency loading and teachers using it as a *de facto* curriculum, syllabus or guide for teaching. It recommended against the latter.

Appendix B

National EAL/D education Roadmap articulation with the NPI of the current NSRA

NPI Direction	NPI related project/target	EAL/D Roadmap action	EAL/D policy issue addressed
<i>A. Supporting students, student learning and student achievement</i>	The National School Resourcing Board to review SRS arrangements	ACTION 1: Restore adequate needs-based funding for migrant, refugee and Indigenous English language learners	Need to review the inadequate needs-based funding of the Gonski low English proficiency loading
	Ai Enhancing AC to support teacher assessment of student achievement and growth against clear descriptors	ACTION 2: Upgrade EAL/D teaching and learning resources in the Australian Curriculum	Need to renew national curriculum support for differentiated EAL/D learner assessment and pedagogy.
	Target c. At least halve the gap for Aboriginal and Torres Strait Islander students in year 12 or equivalent attainment rated by 2020, from 2006 baseline	ACTION 3: Leverage quality bi-lingual, bi-literacy education to improve Indigenous students' achievement in remote school communities	Continued failure of monolingual educational approaches and programs to improve Indigenous students schooling outcomes.
	Aiii Reviewing senior secondary pathways into work, further education and training	ACTION 4: Guarantee education, training and employment pathways for educationally vulnerable Indigenous, migrant and refugee youth	Lack of a consistent and coherent national approach to addressing school/ post school education and training pathways for migrant, refugee and Indigenous youth
<i>B. Supporting teaching, school leadership and school improvement</i>	B. ii Strengthening the initial teacher education accreditation system	ACTION 5: Equip all pre-service teachers to cater for EAL/D learners in their classrooms	Pre-service teacher not equipped to teach EAL/D learners in their classrooms
	B. ii Strengthening the initial teacher education accreditation system	ACTION 6: Revive specialist EAL/D teacher education programs	Weakened demand and provision of specialist TESOL courses for schools
	B. ii Strengthening the initial teacher education accreditation system	ACTION 7: Rebuild EAL/D professional learning, leadership and school development	Reduced opportunities for EAL/D professional development for schools, teachers and school leaders
	Bi Reviewing future teacher workforce needs to attract and retain the best and brightest to the teaching profession and attract teachers to areas of need	ACTION 8: Institute systematic, national, evidence-based teacher workforce planning that includes EAL/D specialist teachers	Inadequacy of teacher workforce planning for EAL/D specialist teachers
	C ii Establish an independent national evidence institute to inform teacher practice, system improvement and policy development	ACTION 9: Fast track post-pandemic EAL/D pedagogies of recovery	Need to identify and scale up new effective post pandemic EAL/D pedagogies
<i>C. Enhancing the national evidence base</i>	C. iii Improving national data quality, consistency and collection to improve the national evidence base and inform policy development	ACTION 10: Implement a nationally agreed measure and method of reporting English language proficiency	Need to complete the national project to develop a nationally agreed measure and method of reporting English language proficiency
	C. iii Improving national data quality, consistency and collection to improve the national evidence base and inform policy development	ACTION 11: Ensure transparency and accountability in the allocation and use of the English language proficiency loading	Lack of transparency and accountability in the allocation and use of the English language proficiency loading
	C. iii Improving national data quality, consistency and collection to improve the national evidence base and inform policy development	ACTION 12: Review reporting, accountability and implementation of international student programs in Australian schools	Lack of transparency and accountability in the reporting of international student programs in Australian schools