
QUT's Centre for Inclusive Education (C4IE) produces research on matters that affect students in education with the aim of improving the educational experiences and outcomes of *all*, particularly those experiencing marginalisation. One of C4IE's objectives is to address knowledge gaps and positively influence attitudes by disseminating research evidence, engaging in public debate, and providing quality professional learning opportunities. C4IE makes this submission in response to the Productivity Commission's interim report: *Building a skilled and adaptable workforce*.

Our feedback to the Productivity Commission's Interim Report, *Building a skilled and adaptable workforce* (hereafter referred to as *Interim Report*) is informed by extensive research in schools, experience of pre-prepared curriculum resources made available to teachers in Queensland since the implementation of the Australian Curriculum in 2012, and the peer-reviewed scholarly literature, including data and analyses from PISA 2018 and TALIS 2018.

We present our feedback in two sections. The first section outlines key points that need to be considered. In the second section, we respond to information requests relevant to our expertise.

SECTION 1. Key Points for Consideration

There is a fundamental misunderstanding at the core of the proposal which is that teaching only happens in the classroom and that curriculum development and lesson planning is a separate/subordinate activity.

This perception is articulated most clearly on p. 12 of the interim report, where it states:

In 2023, full-time teachers spent most of their time outside the classroom, including an average of 15 hours a week on planning or preparing for lessons and marking or assessing student work (figure 1.3). There is an opportunity to reduce the time teachers spend on these activities.

We commend the very worthwhile intent of reducing the load on teachers and agree that teachers are shouldering too much administrative load. However, the activities that the Commission is proposing to make available through a centralised bank or library are not administrative tasks; they confer important intellectual and developmental benefits for both teachers and students which enactment of this proposal will put at risk. Our key points for careful consideration are articulated below.

1.1 Expert teaching is a process, not simply a performance. The development of assessment and curriculum, as well as lesson plans and associated learning materials, is intrinsic to the teaching process; moreover, engagement in development and preparation *affects* performance in the classroom. Teachers need to know unit and lesson content deeply to teach it well and the process of planning a well-sequenced unit—backward mapped from summative assessment, in clear alignment with the Achievement Standards—has a role in cementing teachers' grasp of the what, why, and when necessary to support high-quality knowledge-rich classroom teaching. *Responsive teaching* requires teachers to develop *automaticity* of practice, which requires more than discipline/subject knowledge. In order to manage their classroom and respond to the diversity of students within each class in real time, teachers need to be across what they are doing in each lesson and how that lesson fits within the unit scope and sequence (Feldon, 2007). Reviewing unit and lesson plans that have been developed by someone else does not provide classroom teachers with the depth of knowledge necessary to teach that content well, whilst also teaching responsively.

1.2 Ideally, unit development should occur collaboratively in subject and year level teams. While this is challenging in small schools in regional and remote towns, it is not impossible, especially when technology offers opportunities for networking between schools. *A key problem is that planning and preparation has been individualised, requiring each classroom teacher to recreate the wheel.* Individualised planning and preparation

has occurred precisely because curriculum development has been perceived as a distraction from and not intrinsic to the teaching process. Individualisation has also occurred because the time necessary for collaborative year/subject level curriculum and assessment development has not been provided.

1.3 The real problem in Australia is not that teachers are spending too much time “outside the classroom”. It is that Australian teachers’ average face-to-face teaching load is higher than the OECD average and the number of hours that teachers spend face-to-face teaching has increased over time.

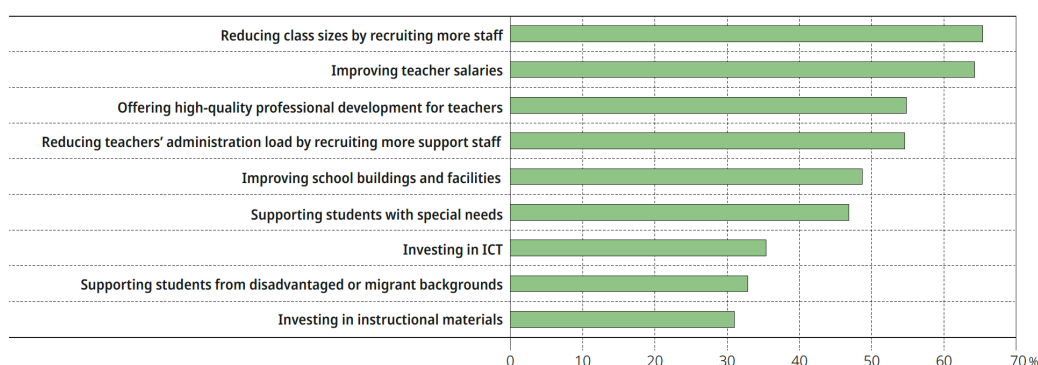
We note that the Interim Report highlights Singapore’s provision of a library of curriculum aligned teaching resources, however, in TALIS 2018, teachers from both countries reported spending the same number of hours per week on lesson planning and preparation. One key difference is that Singaporean teachers spend an average of 2 hours less a week in face-to-face teaching than Australian teachers do.

1.4 The crux of the problem is this: the more hours teachers spend in face-to-face teaching, the more time they must spend outside school hours on all other duties. Of those duties, teachers nominate “having too much administrative work to do” and “having too much marking” as their major sources of stress with a higher proportion of Australian teachers than on average across the OECD highlighting administrative burden. Importantly, TALIS 2018 (OECD, 2019) identified a global decline in time for lesson preparation and planning, which was “worrying, as past research has emphasised the importance of teacher preparation time for the quality of teaching and student learning” (p. 71). Funding needs to be directed towards reducing the number of face-to-face hours to allow Australian teachers time within their allocated work hours to engage in collaborative quality curriculum development and planning.

1.5 Importantly, the Productivity Commission’s characterisation of curriculum development and lesson planning as separate to teaching is not shared by Australian teachers, many of whom consider curriculum development to be integral to quality teaching. An indicator of the value that Australian teachers place on this aspect of their work can be found in TALIS 2018 (OECD, 2019) survey data in which respondents were asked to rate the importance of nine spending priorities, which included ‘investing in instructional materials’. Across the OECD, this spending priority was ranked the lowest in importance by all respondents (see Figure I.3.16) but Australian teachers placed significantly less value on investing in instructional materials than the OECD average (Percentage of lower secondary teachers who reported the following spending priorities to be of high importance, p. 67).

Figure I.3.16 **Spending priorities for lower secondary education**

Percentage of lower secondary teachers who reported the following spending priorities to be of high importance¹
(OECD average=31)




1. Respondents were not asked to prioritise; they had the possibility to attribute “high importance” to all spending priorities.

Note: ICT: Information and communication technology.

Values are ranked in descending order of the percentage of lower secondary teachers who reported the following spending priorities to be of high importance.

Source: OECD, TALIS 2018 Database, Table I.3.66.

StatLink  <http://dx.doi.org/10.1787/888933932418>

1.6 When asked, teachers say that they want more time to complete this important work and particularly more time to be able to do so in collaborative teams. In our Accessible Assessment ARC Linkage project (Graham & Willis, 2026), conducted in Queensland state secondary schools, teachers stated that they did not want an increase in release of an hour here or there a week because that would be disruptive for their students and would impact the flow of their teaching across the term. Rather, *participating teachers nominated a reduction in the number of lines (classes) they teach* (for example, reducing five lines to four) to provide them with concentrated time to focus on planning and preparation in teaching teams.

1.7 The production and distribution of pre-prepared curriculum materials from an authoritative source, such as the super-agency the Productivity Commission is proposing nationally, will have two related outcomes that deeply concern us. The first outcome we predict is standardisation across diverse contexts with negative impact for Indigenous students and those living in regional and remote communities, and the second is the implementation of unadjusted and inflexible materials which will have a devastating effect on students with disability. These concerns are informed by experience from the state of Queensland, where centrally prepared curriculum resources were provided to support the implementation of the Australian Curriculum over a decade ago. The intent of Curriculum into the Classroom (C2C) was to reduce the load on classroom teachers (Ross, 2024), however, the unintended perverse effects have been considerable.

1.8 C2C has been implemented in many schools and classrooms without local adaptation or adjustment for individual students. Initially Queensland teachers believed C2C was mandatory and felt they did not have the authority to make changes but over time, teachers have lost the knowledge and skills they need to adapt and adjust. If teachers are not actively honing curriculum interpretation and development skills, those skills are either never developed (in the case of beginning teachers) or those skills become 'rusty' and the process becomes both time-consuming and daunting. Familiarity with the Australian Curriculum and the functionality of the ACARA website also wanes with the result that teachers become more and more dependent on packaged solutions and much less capable of making adjustments that uphold the integrity and intent of grade-level academic curriculum. Yet, this is what they must do to meet their legislative obligations under the Disability Standards for Education (DSE; Cth, 2005).

1.9 Emphasising that the materials can/should be adjusted and that they are not mandatory has not been effective in the past. For example, the Queensland Department of Education assured educators that C2C was not mandatory, recommending they be used 'as a starting point', however, Ross (2024) found that "teachers did not consult the Australian Curriculum at all during their planning" and instead commenced from their school's replica of C2C. As curriculum development and planning work assists teachers to differentiate for students in their classes, those adopting C2C were disadvantaged as "decisions about what to cover in acceleration or for differentiation were not included in the C2C materials, nor do they appear in intended curriculum documentation" (Ross, 2024, p. 48).

1.10 We are seeing the same pattern emerging in relation to assessment due to the provision of pre-packaged assessment tasks through the Queensland Department of Education's Curriculum Gateway. For example, some teachers participating in our Accessible Assessment ARC Linkage have expressed doubt as to whether they should be redesigning their summative assessment task sheets for accessibility given that their principal "has mandated use of Curriculum Gateway tasks because they are quality assured". Importantly, the Australian Curriculum is informed by the principles of universal design with the aim of enabling flexibility. We have noticed that these principles are among the first to 'fall out' when the AC is re-engineered through state department or assessment authorities. We have analysed a range of Curriculum Gateway tasks and have come to the conclusion that the Department is doing downstream work that could be pushed back upstream to ACARA, potentially benefitting all states and sectors by clarifying the language in year level Achievement Standards and creating the functionality to enable teachers to create appropriate tasks.

The Curriculum Gateway tasks that we have sighted were clearly not designed as student-facing documents, yet they were being implemented regardless. While we have redesigned those documents for accessibility in collaboration with participating teachers and will be recommending to the Department that they do the same, providing accessible pre-prepared materials does not prevent the other perverse effects that we note above: those being a gradual depreciation in the curriculum knowledge and design skill of teachers which subsequently impacts their capability to adapt for local contexts and make adjustments for students with disability.

SECTION 2. Responses to the Commission's Information Requests

1 Which agency in the existing national education infrastructure is best placed to take on responsibility for (a) the assessment and development of lesson planning materials, and (b) the assessment and procurement/development of advanced edtech tools?

- (1a) Taking the caveats that we have outlined in Section 1, the agency best placed to take on responsibility for the **assessment and development of lesson planning materials** is the Australian Curriculum and Assessment Authority (ACARA) due to the deep knowledge within that organisation of the Australian Curriculum and the work of teachers.
- (1b) The agency best placed to take on responsibility for the **assessment and procurement/development of advanced edtech tools** is Education Services Australia. The Australian government could consider adopting a platform similar to Singapore's [Student Learning Space \(SLS\)](#). The SLS is the core online portal for teaching and learning developed by Singapore's Ministry of Education. It is designed for national schools and aims to provide equitable access to curriculum-aligned resources and advice for students from primary to pre-university levels. Teachers can utilise a customisable range of tools within the SLS to create tailored learning experiences for diverse student needs and share online lessons (UNESCO, 2023).

3 Funding implications for both recommendations, including views on appropriate cost-sharing arrangements?

The Australian government should explore funding for independent research to evaluate the effectiveness and suitability of resources and materials related to assessments, lesson plans, and educational technology tools. Allocating funds for independent evaluations of these resources and tools presents an opportunity for the government to ensure that the agencies responsible for developing them are held accountable for their quality and adherence to the latest research evidence.

References

- Disability Standards for Education 2005 (Cth). <https://www.legislation.gov.au/F2005L00767/latest/text>
- Feldon, D. F. (2007). Cognitive Load and Classroom Teaching: The Double-Edged Sword of Automaticity. *Educational Psychologist*, 42(3), 123-137. <https://doi.org/10.1080/00461520701416173>
- Graham, L. J., & Willis, J. (Eds.). (2025). *Accessible Assessment and Pedagogies: Improving Student Outcomes Through Inclusive Practice*. Taylor & Francis.
- OECD (2019), *TALIS 2018 Results (Volume I): Teachers and School Leaders as Lifelong Learners*, TALIS, OECD Publishing, Paris, <https://doi.org/10.1787/1d0bc92a-en>
- Ross, E. (2024). Teachers' interpretation of curriculum as a window into 'curriculum potential'. *The Curriculum Journal*, 35(1), 38-55. <https://doi.org/10.1002/curj.239>
- Thomson, S., & Hillman, K. (2020). *The Teaching and Learning International Survey 2018. Australian Report*

Volume 2: Teachers and School Leaders as Valued Professionals. Australian Government Department of Education. <https://research.acer.edu.au/talis/7>

UNESCO. (2023). *Technology in education: A case study on Singapore*. Paper commissioned for the 2023 Global Education Monitoring Report, Southeast Asia - Technology in education. <https://doi.org/10.54676/HOOV5879>

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