

A response to the DEECD Directions Paper

Pathways to re-engagement through flexible learning options

Brotherhood of St Laurence
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Summary

The Brotherhood of St Laurence welcomes the opportunity to provide feedback and recommendations to the Directions Paper on flexible learning options. The Brotherhood has taken a leading role in trialling innovative approaches to assisting disadvantaged young people in learning and skill building that lead to paid work. As the Directions Paper details, a substantial range of reform to education and vocational training is being implemented through Victorian and Commonwealth Government initiatives.

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The government's commitment to improve both the quality and capacity of learning for young people is very welcome. However, the Brotherhood believes a range of additional reforms to current youth support services that go beyond the classroom are still required to significantly improve completion rates and enable a smooth transition to work opportunities.

The Brotherhood believes that high quality education occurs in many forms and in many settings. While acknowledging that retention within the mainstream educational setting is the ideal pathway, there is a need to sustain programs educating young Australians beyond the mainstream school setting.

The Brotherhood's position on flexible learning options, and on appropriate responses to disengagement from education, is informed by a growing awareness of the value of 'adult' and 'hands-on' learning principles. It is also informed by its experience of successful programs, and its knowledge of the challenges facing providers of flexible learning options, and those faced by young people and families experiencing hardship.

Our response is in line with our commitment to the principles of social inclusion which, in this context, is about ensuring that the education system helps all young Australians realise their 'individual potential and contribute fully to the development of our society' (Smyth 2010, p.26). This requires that education policies and programs take into full account the barriers faced by students from disadvantaged circumstances. Applying the social inclusion lens to education policies means addressing financial hardship that limits attendance and full participation; it means addressing the lack of parental support and insight about education, training and career pathways; and it means taking into account the often chaotic lifestyles of a small proportion of young people.

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Our concern with the Directions Paper is that it fails to adopt a holistic approach to consolidation of the large array of programs and interventions aimed at students and young people. The Paper rightly utilises the earlier vulnerable youth framework analysis of the broad range of risk factors experienced by young people. It also stresses the importance of adopting a shared responsibility between all stakeholders to address student disengagement. Yet the documented challenges and key focus areas do not give sufficient weight or priority to reforms needed to ensure vulnerable young people and their families are able to access flexible learning options through individualised and equitably resourced learning plans.

The range of recent reviews, consultations and pilots all point to a consensus that schools cannot solve the challenge of poor attainment in isolation. There is a clear imperative to consolidate the array of fragmented youth support programs into suite of support services linked to well-resourced alternative learning options.

The Brotherhood supports the broad thrust of the Paper's policy directions, but urges reforms to consolidate and adequately resource an inclusive and complementary learning framework, including parental engagement, out-of-school support and alternative learning opportunities, together with excellent schools.

Recommendations

Addressing barriers to engagement

Respect for equity should be more evident in the proposed policy framework. The Brotherhood calls on the DEECD, and indeed all levels of government, to promote measures that mitigate economic barriers to accessing all levels of education in Australia.

Improving the status of flexible learning option providers

Government should not only take steps to de-stigmatise the flexible learning sector, but should encourage its education networks to look upon the sector as a resource, and the educators as specialist professionals capable of sharing valuable knowledge.

Government should establish an accreditation system that gives some Tier 4 providers— those catering for the needs of young people deemed to be at severe risk— access to resources presently available to government schools.

Government should create stronger links between Tier 3 and Tier 4 providers and Regional Office management.

Reviewing responsibilities

Schools must commit to more rigorous and ongoing monitoring of student needs and wellbeing *via* a refined version of the existing Student Mapping Tool, or a dedicated individualised learning plan that takes into account external and environmental barriers to participation in learning.

Schools' responsibilities should include a commitment to re-integrate those students who have experienced off-campus Tier 4 programs, and who then choose to return to mainstream school life.

Funding

The Brotherhood calls for substantial increases in funding for the support of those youth who opt for flexible learning options. We also recommend significant changes to the Student Resource Package model for Tier 3 and 4 funding such that allocations reflect the varying needs of young people. A more centralised approach is also necessary if the inefficiencies associated with maintaining multiple contracts between providers and schools are to be removed.

Better information sharing

To facilitate monitoring and needs assessment, consideration should be given to providing access to appropriate data derived from the Victorian Student Number regime to accredited Tier 4 providers.

Consideration should also be given to greater involvement of the Youth Connections network, due to its capacity to provide local (regional) data on youth disengagement and program needs. This would enable providers to create new programs that fill gaps in service provision.

Workforce

Government should acknowledge and promote teaching in community settings as a legitimate career path and work to increase remuneration, and to help retention in the sector.

It should require all teacher training institutions to incorporate into their courses modules that develop the skills needed to teach in Tier 4 settings. Tier 4 settings should be included as sites for pre-service teaching rounds and fieldwork.

For the purposes of teacher re-registration, government should prescribe a minimum number of hours of professional development activities that equip teachers to better understand disengagement.

About the Brotherhood of St Laurence¹

The Brotherhood of St Laurence is an independent non-government organisation with strong community links that has been working to reduce poverty in Australia since the 1930s. Based in Melbourne, but with a national profile, the Brotherhood continues to fight for an Australia free of poverty. We undertake research, service development and delivery, and advocacy, with the objective of addressing unmet needs and translating the understandings gained into new policies, programs and practices for implementation by government and others. Our work is based on an understanding that the remedy to poverty lies in integrating social and economic policy in order to strengthen the capacities of individuals and communities.

Our research and services focus on those people at greatest risk at key life transition stages considered critical to their future wellbeing. These are:

- the years of retirement and aging
- the years in and out of work
- the years through school to work and further education
- the early years, both at home and into school

Our recent research relating to education and youth transition includes assessments of reengagement programs (Myconos 2010), learning support initiatives (Bond 2009), the cost burden of education for low-income families (Bond & Horn 2009), the experiences of early school leavers (Taylor & Gee 2009), youth disengagement (Taylor 2009), the information needs of socioeconomically disadvantaged parents, (Boese & Gee 2009), and evaluation of the PACTS program (Bedson & Perkins 2006).

We continue to engage with governments through policy submissions. The most recent of these in the area of education and youth transitions include submissions to the Review of Alternative Education in Victoria (May 2009); the MCEETYA consultation on the National Declaration on Educational Goals for Young Australians (October 2008); the Victorian Government consultation on the Vulnerable Youth Framework (September 2008); its review of skills reform (June 2008); to its Blueprint for Early Childhood Development and School Reform (May 2008); and the federal government's Australian Youth Forum Consultation (May 2008).

The Brotherhood's services are also testimony to its commitment to improved outcomes for school students, and to alleviating the problem of youth disengagement. Our current services in the youth transition area include:

- **Homework Centre**: provides a quiet environment where secondary students can study with assistance from volunteer and staff tutors.
- Youth Voice: in partnership with Melbourne Citymission and UnitingCare, the Brotherhood trains young people to conduct research among their peers, and assists those developing relevant policies and programs.
- Community Service Leadership Program: assists young people to develop youth-led projects that benefit their community as part of their VCAL curriculum.
- **Refugee Youth Development Program**: gives young refugees the capacity to find their own pathways, develop as leaders and become involved with their communities, through a range of learning activities that build confidence, skills and resilience.

¹ We have incorporated in our responses to questions 1–8 a number of suggested actions to help develop the policy framework for flexible learning options. In so doing we have addressed Question 9, and for this reason we chose not to respond separately to that question in this submission.

- **Peninsula Youth Connections**: assists young people who are most at risk of disengaging from education or training and therefore not attaining Year 12 or equivalent, and not making a successful transition into further study, training or work.
- Pre-vocational training: focuses on areas such as occupational health and safety, time
 management and Australian workplace culture, and helping job seekers prepare for work or
 work-based training.
- Vocational training: as a Registered Training Organisation, the Brotherhood delivers
 accredited training through pre-employment programs, providing people with a nationally
 recognised qualification and the opportunity to continue learning through a traineeship or
 other educational options.
- Community VCAL and 'Taster' course: the Brotherhood has provided a Community VCAL program in partnerships with 'Skills Plus' (2006) and the Peninsula Training and Employment Program (2007). It has since been granted accreditation by the Victorian Registration and Qualifications Authority to become a CVCAL provider in its own right. It currently provides a Community VCAL program at its Frankston High Street Centre and a 'Taster' course tailored for year 10 students who are alienated from mainstream schooling.
- Parents as Career Transition Supports (PACTS): the Brotherhood's understanding of
 the importance of parents in supporting youth transitions has developed through design,
 implementation and evaluation of the PACTS program which strengthens parental
 understanding and confidence about post-school pathways through targeted, small group
 workshops.

'Does the continuum of flexible learning options reflect the range of programs supporting children and young people in Victoria? Are there any major options not covered?'

The Directions Paper identifies a wide range of flexible learning approaches presently in use. These are categorised according to their association with, and proximity to, the mainstream school setting. A four-tier typology is used:

- Tier 1: set in schools and catering for all students through a diverse range of programs
- Tier 2: set in schools and for those facing risk factors that make disengagement more likely
- Tier 3: set in schools but provided by community sector organisations, and for those facing a range of barriers to learning and/or risk factors that alienate them from the school setting
- Tier 4: provided outside of the school setting by community sector organisations, and catering for those with a long history of disengagement or exclusion from school.

Learning support programs

We believe that more recognition should be given to learning support programs. These are frequently delivered off the school premises, usually independent of the school, and are mostly sustained by philanthropic funding and a volunteer workforce (Bond 2009, p.8). They play a complementary role, and ought not be considered as separate from conventional approaches. Moreover, these programs are flexible and targeted and may cater for the groups at greatest risk of disengagement, such as children and young people in out-of-home care, Koorie children and young people, young offenders, those affected by homelessness, the newly arrived and refugee children and young people, young parents and carers, those with disabilities and with mental health concerns.

Research in 2006 showed that in Melbourne's northern and western suburbs alone, there were 33 programs that collectively had 43 staff and 1273 volunteers, and that assisted 1300 students (Bond 2009, p.7). Features included the following:

- half of the programs catered for CALD or refugee students
- each program had 0–3 paid staff and an average of 10 volunteers
- sessions were held in a wide range of venues: neighbourhood houses (25%), primary schools (22%), libraries (19%) and community agencies (19%)
- three-quarters of the programs ran one session per week, with around half having a flexible format of homework and/or study support, 37 per cent offering homework support only and the remainder offering group activities.

More recently, the data from the Centre for Multicultural Youth's Beyond the Bell program indicated at least 138 learning support programs operated in 2009 (cited in Bond 2009, p.6). It is the Brotherhood's experience that such programs are in high demand. It is presently seeking funds to expand its Homework Centre program within the Atherton Gardens public housing estate (Fitzroy) to cater for low-income people, many of them new arrivals. We have also started a new program aimed at secondary school students in the Mornington Peninsula region.

These support programs are not only for remedial purposes, but also include an array of options—e.g. summer school and after-hours courses—that facilitate critical learning at times when school facilities are unavailable. They play an important role in nurturing the confidence, self-respect, and 'soft skills' needed for better engagement with society in general.

'Second chance' courses

We would also draw attention to other programs that do not fit easily within the Direction Paper's typology. We refer here to initiatives designed to provide a wayside stop for those disengaged students as they contemplate their next move. Here students often opt for vocational training, but also may also choose to re-enter the mainstream school environment.

One example is the Brotherhood's community based eight week 'Taster' course that occurred in term 4 2009. This course was tailored for young people in year 10 who were alienated from mainstream schooling, and who were considering the Community VCAL option in 2010. It incorporated the VET subject, Certificate II in Community Services Work, as well as retail and hospitality training units. The curriculum was also designed to cover the essential components of the VCAL: literacy and numeracy, industry-specific (VET) and work-related skills, and personal development. The Taster was a stand-alone course, but also a forerunner to the 2010 CVCAL program.

It should be noted also that the Brotherhood has also been involved in an extensive consultation process to establish a Community Youth Centre in Caroline Springs. It anticipates being able to offer a flexible learning program for disengaged students as part of that initiative.

Embracing the diversity of learning programs

We believe that to overlook programs such as those outlined would be to deny their important role, not only in engaging with young people who are gravitating away from mainstream education, but also in providing much needed remedial tuition for those within conventional settings.

Importantly, though the Brotherhood considers the four-tier typology to be a useful starting point, it notes that it does not adequately reflect the diversity of programs that already exist, or that may emerge. Moreover, we question the usefulness of the typology because it may exacerbate differences between young people and further entrench the stigmatisation of the 'at risk'. For these reasons we caution against the typology being adopted as the only framework to differentiate between programs and, importantly, to determine the allocation of funds.

'How can Tier 3 and Tier 4 flexible learning options be supported and strengthened to better engage and retain children and young people at high risk of disengagement?'

The Brotherhood has welcomed recent state-wide education reforms that address the conditions that give rise to student disengagement. Four key initiatives specifically aimed at addressing disengagement are mentioned in the Directions Paper:

- the implementation of the enhanced network model for government schools and the appointment of Regional Network Leaders
- the Ultranet, a new online learning environment linking those within, and beyond, the school setting
- the release of Effective schools are engaging schools: student engagement policy guidelines
- service system reviews being conducted by the Office of Youth, called the Better Youth Services pilots.

If Tier 3 and 4 providers are to be an effective part of this reform agenda, a number of steps should be taken.

Improve the status of alternative learning settings, approaches, and educators

Government must play a more active role in legitimising Tier 3 and Tier 4 providers. The Brotherhood believes that the status of these providers is relatively low in the eyes of educators, government agencies, and the wider community. We believe it is important that the government play a more active role in conveying to the community the vital role played by providers of flexible learning options. This is necessary given the complex needs of the student cohort, the growing awareness of the importance of combining adult and vocational education principles with conventional teacher-centred, classroom-based pedagogies, and the importance of preserving connections between disengaged youth and education.

Provide resources for community based providers

The Brotherhood is strongly in favour of reform that provides Victorian Institute of Teaching (VIT) accredited teachers working within Tier 4 with the resources and support presently accorded to those working within mainstream government and independent schools. It is essential that teachers have access to government-sponsored professional development and training in conflict management skills, mental health 'first aid', drug and alcohol counselling, and in approaches to learning disorders. In addition, there is need for reform to pre-service training that encourages teachers to pursue careers in the Tier 4 sector; and reform to accreditation frameworks for better acknowledgement of the unique skills possessed by those in the sector. Those providing flexible learning options would also benefit through access to teaching materials and classroom resources available through the DEECD's Ultranet and Knowledge Bank (e.g. digiLearn, IntelSkool, Scootle). We would add here, however, a caveat on the usefulness of the Ultranet in overcoming disengagement among young people with significant barriers to participation in learning. This is because these barriers often include the lack of computer and internet access within the family home (Bond 2009).

'Are the suggested roles and responsibilities for addressing student disengagement reasonable and practical?'

The Directions Paper presents a map of the various stakeholders, along with suggested roles and responsibilities. Principal stakeholders include the DEECD central office, regional offices, school networks, schools, families and carers, and community service organisations. The Brotherhood welcomes the acknowledgement of the role of community service organisations (i.e. Tier 3 and Tier 4 providers) whose roles are said to include:

- liaising with schools to assist in identifying students at risk of disengagement
- supporting children and young people to re-engage with schools
- developing and maintaining partnerships with schools to provide Tier 3 and Tier 4 programs.

However, the Brotherhood believes that this seriously understates the breadth and complexity of the community service sector. A typical Tier 4 program (e.g. a Community VCAL program) necessarily provides wrap-around support for students with complex needs and who face many barriers to learning (see Question 5 for more detail).

It is important to recognise formally that such community sector programs involve constant and often time-consuming collaborations with:

- schools and school networks
- DEECD Regional Offices
- TAFEs and other VET providers
- employment service providers
- careers and transitions advisors
- families and community organisations
- government departments and agencies, e.g. the VCAA
- Local Learning Employment Networks
- the business community
- case workers and social workers
- drug and alcohol counsellors
- mental health and housing support networks
- police and the juvenile justice system

Indeed Tier 3 and 4 providers play a vital role in maintaining what ought be regarded as a 're-engagement' or 'second-chance' education for many of the most vulnerable young Australians.

In relation to other stakeholders the Brotherhood strongly endorses the roles and responsibilities allotted in the Directions Paper to department's regional offices and school networks. Specifically, we are in favour of their growing involvement in 'overseeing...the effectiveness of Tier 3 and Tier 4 programs' (p.18), and in promoting mutual support between all agencies, across the relevant sectors.

The Brotherhood believes that schools should also be responsible for re-integrating those students who have experienced off-campus Tier 4 programs, and then choose to return to mainstream school life. It should also include a commitment to more rigorous and ongoing monitoring of student needs and wellbeing. A refined, more user-friendly version of the existing Student Mapping Tool would suit the purpose, and it should be required as Best Practice. The continuity of an

individualised learning plan that takes into account external and environmental barriers to participation in learning is critical for young people who benefit from Tier 3 and 4 settings. There should be clear accountability for monitoring and reviewing progress against such a plan.

Lastly, a note of caution. While many parents have the capacity to meet the responsibilities as outlined in the Directions Paper, many others do not, particularly those in low SES neighbourhoods and with disadvantaged children. The effect of an incapacity to fulfil responsibilities is a greater load for the community sector organisations within Tier 3 and Tier 4, as well as for schools themselves.

'How can school networks and regions play a stronger role in supporting schools and stakeholders to provide innovative flexible learning options that meet local needs?'

It is evident that youth welfare services, and particularly those which provide education and training, are too fragmented. The Brotherhood strongly endorses reforms that consolidate the sector (particularly across those within Tiers 3 and Tier 4).

There is a pressing need to ensure that the regions and school networks work collaboratively with the Tier 3 and Tier 4 providers. The Brotherhood identifies a number of measures that should be taken to assist such providers to meet local needs.

Advocacy

Providers in Tier 4—and to a lesser degree, in Tier 3—play an essential mediating role between schools, families, communities, training and support agencies. The school networks and regions can provide support by countering a persistent and negative view of those providing flexible learning options. There is a tendency to regard community-based programs as dumping grounds for 'at risk' and 'troublesome' youth. The Brotherhood believes that the DEECD should not only take steps to de-stigmatise the sector, but should also encourage its networks to look upon the sector as a resource, and its educators as specialists capable of sharing valuable knowledge. The Brotherhood believes that respect building measures are vital to future partnerships between all stakeholders.

Support and facilitation

The Brotherhood endorses reforms that encourage school networks and regions to lend support to Tier 3 and Tier 4 flexible learning option providers. It is aware that schools and school networks are often under considerable operational pressure, and those liaising with Tier 3 and Tier 4 providers are sometimes resource and time poor. Nonetheless, the Brotherhood believes that more support can be provided by school networks and regions to flexible learning providers.

Our existing relationship with the DEECD's Southern Metro Regional Office may represent a model to be adopted elsewhere. Developed as the Brotherhood has undertaken to provide education programs such as its Community VCAL and 'Taster' courses for disengaged youth in the Frankston region, the relationship features:

- a regional referral system coordinated by the Region Office requiring schools' compliance with procedures that ensure all efforts have been made to retain students before they are given the opportunity to commence an alternative program
- protocols requiring schools to consult the Regional Office for the purposes of assessing the suitability of Tier 3 or Tier 4 programs
- Regional Office representation on the external advisory groups of Brotherhood programs
- close consultation with and guidance from the Regional Office during the design and initial stages of programs
- attendance of Regional Office personnel at Brotherhood parent information events.

This involvement is exemplary, and occurs in spite of the great demands placed on the Regional Office. It is an acknowledgement by the Office of the importance of supporting providers of high quality education options.

The Brotherhood would strongly endorse moves that encourage Regional Offices and schools to facilitate closer relations between families/carers, student support networks, LLENs, Youth Connections, and job service providers.

The Brotherhood's healthy relationships with schools in the Frankston region are also worthy of note. Nonetheless, they have required careful nurture and much has relied upon the goodwill and commitment of individuals, rather than on procedural obligation. The Brotherhood would welcome greater

- exchange of information in relation to students' needs and background
- willingness by schools to re-integrate students who wish to resume their education in a mainstream setting
- formal and informal interaction between staff and students from mainstream schools and off-campus settings
- exchange of information about professional development events, and innovative teaching materials.

'Are the challenges to the provision of flexible learning options accurate?'

The Directions Paper understates the range of challenges facing Tier 3 and Tier 4 providers. We have earlier noted in our response to Question 4 the importance of improving the status of flexible learning options across the educational landscape. To counter these negative perceptions, the Brotherhood calls for greater recognition of the disproportionate load carried by such providers, and the complex nature of the wrap-around support for students.

Complex student needs

The students engaged in flexible learning programs are typically those who have experienced difficulties within and beyond the school setting. Many have faced significant barriers to learning such as their families' incapacity to cover the costs of mainstream schooling (e.g. uniforms, books, excursions and, often, travel) (Bond & Horn 2009). Many have persistent learning difficulties that were not addressed in earlier stages of schooling. Many who are engaged in Tier 3 and Tier 4 programs are also contemplating profound questions regarding their futures. Many are experiencing great uncertainty, if not instability, in their home lives, relationships, and career pathways. A significant minority are also dealing with problems associated with substance abuse, homelessness, violence, and disability.

Complex service provision

Complex needs present significant challenges for the flexible learning option provider. The KPMG review of the sector acknowledges that dealing with young people with histories of disengagement is 'a complex and time consuming process' (KPMG 2010, p.21). Teachers and trainers have to manage often intense relationships with students while maintaining appropriate boundaries, and have to provide complex pastoral care with limited resources. Teaching in such environments is very demanding, and requires the highest levels of motivation.

To provide a positive and therapeutic learning environment, employees are required to be, at once, outstanding classroom teachers, competent workplace trainers, career advisors, case managers, and welfare officers. The unconventional nature of Tier 4 programs often makes the recruitment of such teachers difficult. Moreover, those overseeing Tier 4 programs devote considerable time and energy to liaising with students, VET providers, employers who host trainees, schools of origin, job service providers, welfare organisations, parents and other 'significant adults'. Teachers in this sector are isolated from the mainstream teaching fraternity. Without peer support, stress, and indeed loneliness, is all too common.

Resources

The costs of providing flexible learning options within the community sector are substantial, and most providers operate in or near deficit. Cost cutting means that the following vital areas of education are often compromised:

- recruitment of VIT-accredited teachers, or qualified trainers
- aides and specialist assistance
- the range of vocational training options
- facilities and equipment for hands-on learning activities
- excursions and field trips
- partnership building and outreach activities
- data collection

The Brotherhood is keenly aware of costs of alternative learning options that suit disengaged young people. The costs associated with providing our Taster and Community VCAL are approximately twice the amount recovered from DEECD *via* the Student Resource package.

Our 'Taster' program produced very good educational outcomes for those who had disengaged from mainstream education (Myconos 2010). Subsequently, our Community VCAL course has commenced and early evaluation indicates that it too will be very successful. However, both programs run at significant deficits, with their sustainability in doubt as a result.

'How can a policy framework better guide and support the provision of flexible learning options across Victoria?'

The Brotherhood believes that a more effective policy framework will be one that addresses underlying barriers to engagement, improves the mode and source of funding, facilitates information sharing, and improves the perceptions of Tier 3 and Tier 4 providers.

Addressing the underlying barriers to engagement

Research conducted by the Brotherhood underscores the need to alleviate the disadvantage that hinders access to education. There is no doubt that economic disadvantage combines with other forms of exclusion to severely limit students' capacity to benefit from education. The costs for education are significant for those moderately well off, let alone for those experiencing economic hardship and compounding factors. This disadvantage manifests itself in limited or no access to computers, printers, on-line services, books, excursions, or the co-curricular activities that are paid for by parent/learner contributions (Bond & Horn 2009). For these reasons, the Brotherhood calls on the DEECD, and indeed all levels of government, to promote measures that mitigate economic barriers to accessing all levels of education in Australia.

Funding

We have outlined elsewhere in this response the challenges faced by Tier 3 and Tier 4 option providers, and how these combine to place considerable financial stress on them. The Brotherhood calls for substantial increases in funding for the support of those youth who opt for flexible learning options. We note that while the KPMG review of flexible learning options emphasises the need to address inequity (KPMG 2010, p.102), that focus is lacking in the Directions Paper itself.

A restructured policy framework must address the present *ad hoc* funding arrangements, identified in the KPMG review (KPMG 2010, p.36). The Brotherhood endorses KPMG's recommendation to adopt a 'place or package based funding model' (KPMG 2010, p.104). We would strongly urge that changes be made to the existing Student Resource Package model, so that its allocations reflect the varying needs of the students. The Brotherhood seeks a more centralised approach which is attuned to the specific form of Tier 3 and Tier 4 service provision, and that overcomes the inefficiencies of maintaining multiple contracts between providers and each school they serve.

More effective information sharing and understanding

There is need to harmonise the processes, cultures, and nomenclature at each level: that is, between government and independent school sectors, career advisors, job service agencies, and VET providers. Navigating these sectors, and making considered choices, is a fraught process for all concerned: often bewildering to adults, let alone to young people. Though information is plentiful, it is not well understood or used. To achieve inclusion will require action to bridge this gap. The Brotherhood calls for greater information exchange and openness between all stakeholders to enable Tier 3 and Tier 4 providers to anticipate need and adjust programs accordingly.

Consideration should be given to providing access to the Victorian Student Number regime to accredited Tier 4 providers in order to facilitate monitoring and needs assessment. In addition, consideration should be given to greater involvement of the Youth Connections network due to its capacity to use its data on youth disengagement to assess local and regional program needs, to help Tier 3 and Tier 4 providers to create new programs that fill gaps.

Perceptions of flexible learning option providers

The Brotherhood reiterates the need for policy that values flexible learning option providers. We call for a framework that gives due recognition, for example, to approaches to education aimed at developing skills through an emphasis on 'adult' and 'hands-on' learning principles. Moreover, it calls for a framework that encourages cooperation between Tiers, and that enables students to move between sectors as their needs change.

'Are the proposed components of the policy framework for flexible learning options relevant and appropriate? Are there any components that have not been covered?'

The Brotherhood welcomes the move towards a comprehensive and cohesive policy framework governing the provision of flexible learning options. We comment below on the appropriateness and relevance of the framework components (these appear in italics). The Brotherhood's views (indented) appear beneath the relevant component headings.

Vision: 'Victoria will provide a socially inclusive education system in which all children and young people receive the support they need to enable their engagement in school, their wellbeing, learning opportunities and pathways to further education, training or employment. Students who are at risk of disengaging or already disengaged will remain a priority for the Victorian Government'.

The Brotherhood strongly endorses a vision which promotes social, economic, and cultural inclusion. It also strongly endorses a vision that acknowledges the need to tailor service provision to need. This is especially welcome in the context of education for those at risk of disengaging, given that appropriate responses often lie beyond the mainstream. We commend the recognition of the importance of pathways to further education, training, and employment, as this is a central concern for most providers of flexible learning options.

Outcomes: Student learning, Student engagement and wellbeing, Student pathways and transitions

The Brotherhood supports the move to incorporate into the outcomes framework student learning, engagement and wellbeing, pathways and transitions. We are particularly concerned to ensure that diverse pathways and transitions are featured, since many students engaged in Tier 3 and Tier 4 programs are likely to pursue apprenticeships, traineeships, or other vocational options. Moreover, given the obstacles already faced by many students who are at risk of disengagement, pathway and transitions assistance needs to be available both during and after any study or course.

Continuum of flexible education provision: Personalised learning – targeted supports – flexible learning options in schools – flexible learning options in a separate setting

The Brotherhood endorses the acknowledgement of flexible learning options. We recognise that the most effective approach is one that views such options as complementary to traditional educational programs. However, we note the absence of 'assessment of barriers to learning'. As noted earlier the ongoing use of a refined version of the Student Mapping Tool must be made a routine requirement not only for schools, but also for Tier 4 providers. A full personal assessment of all barriers to learning is the vital first step to the implementation and review of an individualised learning plan with equitable resources.

Good practice principles: Inclusive – developmentally responsive – comprehensive, wrap-around approach – engages parents, families and support networks – flexible – timely and accessible – mentoring relationships – evidence based

These are principles which underpin the Brotherhood's approach to service provision and are strongly endorsed. The challenge is to develop and resource the administrative infrastructure that enables implementation, and that places the young person at the centre of support and learning. This will require reform to address the current fragmentation of youth support services.

Key focus areas: Skilled workforce – accountability – local solutions – partnerships – targeted use of resources

The Brotherhood welcomes the introduction of clearly delineated focus areas, and supports a framework comprising the above. Nonetheless, we have the following misgivings. It is undeniable that a skilled workforce is a prerequisite for effective provision of flexible learning options. Yet, it is

unclear in this Directions Paper to what extent educators employed in the Tier 4 will be recognised and valued as part of that workforce.

We are concerned at the absence of a focus area which deals specifically with equity, costs of education and, hence access.

Governance and accountability: Cross-government – system-wide – regional – network – school

The Brotherhood offers cautious support for this component. Hitherto, governance at the regional level in particular has been characterised as uneven and inconsistent (KPMG 2010, p.3). We endorse a framework that features cross-government collaboration. However, we would welcome a more detailed articulation of where authority will lie. We would welcome more clarity about responsibilities in relation to overall coordination, assessment, engagement, and review.

In our responses to previous questions we emphasised the complex nature of student needs in Tier 4, and for this reason welcome a framework that draws on the resources and expertise of other arms of government, e.g. the Department of Human Services, Department of Planning and Community Development, the Department of Innovation, Industry and Regional Development, among others. In our response to Question 8 we raise some issues relating to accountability within this framework.

'How can the key focus areas be strengthened in practice to enable more effective provision of flexible learning options?'

The Directions Paper identifies five potential focus areas for a policy framework. We suggest improvements to each:

A skilled workforce

There is an acknowledgement in the Directions Paper and elsewhere of the need to improve workforce capacity. Underlying this is ongoing professional development as well as the 'capacity to gain and share specialist knowledge from others working with this group of children and young people' (KPMG 2010, p.28). The Brotherhood is concerned that educators working with 'disengaged' students within Tier 3, and particularly Tier 4, will continue to be denied vital resources and recognition.

We list below difficulties encountered by teachers in the Tier 4 sector:

- VIT reluctance to recognise Tier 4 providers as legitimate education institutions and denying teacher registration
- Tier 4 Community VCAL teacher not being recognised by either government or independent sector unions
- not being recognised (through either pay or status) as a VIT-registered teacher presenting VCAA approved coursework, and so being employed under the Education Services (Teachers) Award 2010, which does not offer the same status or annual wage increases as the government and independent school awards.
- lack of online access to a wealth of resources and documents on the DEECD website.
- inadequate training in the postgraduate diploma of education to work in an alternative setting.

The Brotherhood urges government to consider the following measures to address this concern:

- Formally acknowledge and promote teaching in community settings as a legitimate career
 path and work to increase remuneration, to help retention in the sector. It is vital that VIT
 accredited teachers who choose the flexible learning option path are not disadvantaged
 through estrangement from mainstream resources and settings
- Require all VIT-recognised teacher training providers to incorporate into degree and
 diploma courses modules that develop the skills needed to teach in community settings.
 These modules would cover the principles and practices associated with 'adult' and
 'hands-on learning', remedial literacy, mental health triage, and counselling. Moreover,
 training providers should ensure that Tier 4 settings are included in pre-service teaching
 rounds and fieldwork
- For the purposes of teacher re-registration, the VIT should prescribe a minimum number of hours to be devoted to professional development activities that equip teachers to better understand disengagement. The precise number of PD hours required would be calibrated as a proportion of the total mandated for each teacher category in the re-registration criteria
- Establish a review and accreditation system that gives those Tier 4 providers which are catering for the needs of young people deemed to be 'at risk' access to resources presently available to those teachers working in the government sector. These resources would include an 'edumail' account, access to Ultranet, Knowledgebank, and invitations to the range of government sponsored professional development events.

Accountability

The Directions Paper does not identify a clear accountability structure for Tier 3 and Tier 4 providers. The Brotherhood looks to the KPMG review for guidance and supports its proposed system of accountability that recommends stronger relationships between community providers and Regional Office management. This system would be overseen by Regional Directors and their appointed 'contract managers'. The Brotherhood believes such an approach would foster closer engagement between all community sector providers and the mainstream. It will also provide the necessary oversight to ensure program suitability. All such accountability obligations must be clearly outlined in relevant MOUs between providers and relevant schools.

The Brotherhood notes that the Directions Paper flags the need for 'a comprehensive data collection effort' and the 'sharing of data between schools and non-school providers of flexible learning options'. While the Brotherhood acknowledges the need for data collection and sharing, it is likely that such efforts will be compromised unless non-school providers are adequately resourced for the task.

Local solutions

The Brotherhood welcomes an emphasis on local solutions. However, our experience tells us that while local solutions are essential, there must be mechanisms to address the needs of transient young people who move across regions. Data collection is important, but so too are case management and student welfare regimes that extend beyond the local.

Partnerships

We have noted elsewhere the importance of partnership building as an intrinsic part of providing flexible learning options, particularly involving community providers. The Brotherhood reiterates the need to acknowledge that partnership building is costly and time-consuming. The measures suggested earlier to strengthen the sector are essential for effective partnership building. In addition, the Brotherhood suggests the following measures:

- the incorporation of those 'accredited' Tier 4 providers (see 'A skilled workforce', response to Question 8) into incentive programs presently run by several government departments, and for the benefit of government schools. For example, incentive programs such as the Office of Youth's 'Advance Program' should be made accessible to those community organisations providing flexible learning options.
- addressing the confusion and lack of clarity in existing information and data management by making procedures more uniform and accessible. This is particularly important for referral processes for students who are gravitating towards Tier 4 learning settings.

Appropriate targeting of resources

The Brotherhood strongly endorses a framework that enables such targeting of funds. We have stated elsewhere in this response our commitment to social inclusion, and to addressing the needs of the most disadvantaged. We support reforms that sustain wrap-around support and that acknowledge the need to 'adjust for factors that may influence demand for flexible learning options, such as adjusting for low socio-economic status so that lower socio economic areas get a slightly larger share of the funding...' (KPMG 2010, p.102). Of particular concern here are children and young people living in non-metropolitan or outer suburban areas whose families and guardians have difficulties paying for travel and other expenses associated with attending Tier 4 programs.

Conclusion

There is a broad consensus that schools cannot in isolation solve the challenge of youth disengagement. The Brotherhood thus supports the general thrust of the reforms outlined in this Directions Paper, but calls for a stronger emphasis on consolidation and resourcing in order to create a more inclusive and complementary learning framework. The Paper rightly focuses attention on vulnerable youth and the multiple risk factors experienced by young people. It also stresses the importance of all stakeholders sharing responsibility to address student disengagement. Yet the Paper's key focus areas do not give sufficient weight to reforms needed to ensure vulnerable young people are able to access flexible learning options through a valued and well-resourced network of providers.

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