

Independent Review of administrative and compliance activities in Victorian government schools

April 2025

Letter to the Minister

28 April 2025

The Hon. Ben Carroll
Deputy Premier and Minister for Education
1 Treasury Place
Melbourne VIC 3002

Dear Minister Carroll

I am pleased to submit to you the final report of the *Independent Review into administrative and compliance activities in Victorian government schools*.

In accordance with the terms of reference, this report provides a detailed analysis of the current state of administrative and compliance activities in government schools, their impact on school staff, and practical recommendations aimed at reducing unnecessary workload while maintaining high standards of safety and accountability.

In fulfilling the terms of reference, it has been my goal that this Review would not only assist in understanding the state of administrative and compliance activity, but contribute to ensuring that our government schools are attractive places to teach, lead and work. The recommendations of this Review ultimately aim to ensure our educators wish to remain in the profession, and that our principals and education support staff can lead and support them to remain focused on what matters most to improving student outcomes.

The Review has engaged extensively with stakeholders across the education system, including school leaders, teachers, educational support staff, and department staff. Many school staff gave up hours of their time to provide feedback to my review team, and their insights have been invaluable in identifying the scope, burden, and opportunities for streamlining administrative and compliance workload within Victorian government schools.

Schools operate in a climate of growing regulatory burden which is increasing administrative and compliance workload. This phenomenon is not unique to Victoria nor to education, with similar trends felt nationwide across many sectors. The Victorian Department of Education, like its counterparts across Australia, is not usually the cause of this increased workload, but it does have the responsibility to support schools to manage the workload.

The department has been conscious of administrative and compliance burden for many years, and has made significant progress in addressing it, but there is more that can be done. Centrally delivered services, IT improvements, reductions in duplicative tasks, and clarifications of requirements are some of the themes of the Review's recommendations.

However, the department cannot stem the tide of administrative and compliance burden on its own – a whole of government approach is needed. Regulators and other agencies create rules and processes that the department has to implement with schools, and it is important to regularly review the implementability of these requirements, analyse their cost and benefit, and fund supports to reduce their impact on school staff workload.

I believe that the findings outlined in this report provide a strong foundation for meaningful reform, enabling schools to focus more fully on the core business of education: supporting student learning and wellbeing.

The findings from this review build on the work of school staff associations and unions that have been analysing these issues for many years. I want to thank the Australian Education Union, the Australian Principals Federation, the Victorian Principals Association, the Victorian Association of State Secondary Principals, the Principals Association of Specialist Schools, the Country Education Partnership, and Business Managers Victoria for the effort they all put into making sure staff working in all types of government school

contexts across the state were able to participate in the Review. I would like to also thank the department's senior leaders for their openness to discuss the issues and opportunities raised by the Review.

I extend my gratitude for the opportunity to contribute to this important work and for the department's ongoing commitment to improving the experience of educators and education support staff across the state.

Sincerely,

Katie Roberts-Hull
Lead Reviewer

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Executive Summary

This *Review into Administrative and Compliance Activities in Government Schools* (the Review) was established in response to concerns from school staff and the department about the level, cost and reasonableness of administrative and compliance activities in Victorian government schools (schools).

Every job – and especially every profession – has administrative and compliance activities. No job is only about doing just one thing. There are meetings to attend, forms to fill in, plans to develop, notes to write up, training to do, requirements to meet, and approval processes to follow. Jobs come with responsibility, and responsibility comes with accountability. Even when such work is not enjoyable, much of it exists for good reason – to keep workplaces and staff safe, to manage real risks, and to prevent the mistakes of the past being repeated. Schools are particularly sensitive workplaces – in addition to the tens of thousands of staff employed in them, each day there are hundreds of thousands of children entrusted to their care, and each year they are provided with billions of dollars of public funds.

Whilst goals such as safety, risk management and accountability are important, the exact tasks required of school staff to achieve these goals can, at times, be complex and time-consuming due to the technical compliance requirements made for all industries or be ineffective. Sometimes an overly complicated compliance task can unintentionally increase risk by distracting school staff from the things that are most important.

Critically, to achieve excellent educational outcomes, we need to attract and retain the best teachers, principals, and education support (ES) staff in government schools. An excessively high administrative and compliance workload risks discouraging educators because it takes them away from their core purpose: the teaching, learning and wellbeing of students. Several recent reports show there is a problem. The feedback regularly provided by staff – and the rate at which staff are leaving the school system – indicates an unsustainable administration and compliance workload.

This Review aims to make recommendations which will have a positive felt impact on the administrative and compliance workload in government schools for all school staff. This includes reviewing tasks which do not take a large quantity of time but carry a significant mental load. This Review also looks at systemic issues like the growing scope of the principal role and the merits of alternative models for where responsibilities sit and what supports are available.

The Review considers how different school contexts affect school staff administrative workload. Small schools have a different experience compared to large schools, for example, and specialist schools or schools with diverse student populations will have unique administrative and compliance workloads.

The time and effort staff are required to spend on administrative and compliance activities needs to be reasonable and proportionate to the risks and issues being managed, and the overall purpose of the role. Sometimes the requirements themselves are reasonable, but the systems, processes and supports involved could be improved to make it easier for school staff to comply. Where it can be made less burdensome or difficult, it should be.

Overall, this Review's goal is to set out a plan to reduce the time and effort staff in Victoria's government schools spend and expend on administrative and compliance activities, to give those staff more time and energy for great teaching.

Key findings

The Review's recommendations are founded upon extensive consultations with stakeholders across the Victorian government school system and beyond (see Appendix A: About the Review). The consultations for this Review heard from the workforce - including principals, teachers, classroom support, wellbeing and administrative staff – that administration and compliance work was compounding daily stressors, particularly where guidance and resources are unclear, or where systems were inefficient. School staff workload has been highlighted as an issue in previous surveys and research papers, and the Review heard that administrative and compliance tasks are the main workload concern for about half of educators. For these school staff, there is

often a lack of resources and time for staff to complete administrative work on top of their normal responsibilities. They face a trade-off with other types of work, concerned that they do not have time for work most directly related to improving student outcomes.

There are 7 key findings from the Review.

Finding 1: Administrative and compliance workload is a significant and growing workload.

While some level of administrative and compliance activities is unavoidable – and valuable – the Review finds that this work has been growing and taking up a larger and larger share of school staff time and budget. The main concern is stopping the growth of this workload (not eliminating it entirely) as it is becoming increasingly unsustainable and very costly.

Much of the increased workload is driven by broader factors outside the education system that are being experienced in every jurisdiction across Australia, including increasing regulatory complexity and greater community expectations of schools. New requirements for schools usually have good purpose and may be responding to a real problem, such as improving student safety or reducing financial risk. However, while the goals are always sound, the exact tasks required may not be well-designed or evidence based.

Some administrative and compliance activities have unclear or lengthy guidance, long forms, aging information technology (IT) systems, repetitive processes or unnecessary complexity or detail.

Some of the workload could be done by department staff instead of schools. Schools could also be better supported to develop efficient systems and staff structures to better handle the administrative workload.

Finding 2: Administration and compliance tasks take school staff away from their core business of improving student learning and wellbeing

The Review found that administrative and compliance takes up time that would otherwise be used for work more directly related to improving student learning and wellbeing of students. Even though most administrative and compliance work is important, and much is essential, it is important to clearly state that more administrative and compliance work means less time for other tasks.

The Review found that school staff are making trade-offs in the limited time they have about what will be the most purposeful work. School leaders generally signal what to prioritise, and their choices vary. Some school leaders are confident and skilled enough to decide what administrative and compliance work is essential, what is optional, and how to effectively meet all requirements while maintaining a focus on teaching and learning. Others are not able to figure out how to manage all of the administrative and compliance requirements and maintain educational priorities.

Finding 3: Administrative and compliance workload is affecting school staff wellbeing and retention

Many teachers and leaders say that they are considering leaving the profession because of this increasing administration workload. It is not always overall workload that is most concerning, but more the sense of being pulled away from what they believe to be more purposeful work. Many school staff are taking administrative work home and dealing with stressful incidents that require documentation and compliance work.

The Review recognises that much of the added administrative and compliance workload is based on well-intentioned efforts to reduce risk and improve safety and student wellbeing outcomes. However, when the combination of these tasks results in a large workload, there is a risk that teachers and staff will leave the workforce and schools will be understaffed. All of the safety and compliance measures will be significantly less effective without skilled staff that know the students and families through multiple years of service at the same school.

Finding 4: Efficient administrative practices exist in many schools, but there is variance

A positive finding from the Review is that many schools already have systems and structures that reduce administration and compliance workload for staff. Some schools are so efficiently run that teachers and ES staff reported virtually no concerns with their administrative workloads. These schools have 'efficient practices' across

many categories of work, including meetings, planning and lesson documentation, assessment and data collection, semesterly reporting to families, managing student attendance, and using administrative support to reduce teacher workload.

The schools that have been successful in creating an efficient administrative culture usually have:

- strong internal structures
- clear roles and responsibilities
- clear priorities and are unwavering about sticking to them
- hired additional administrative staff to take work off teachers
- principals who are confident enough to exercise judgement in managing external requests.

Schools that are better at shielding teachers from administrative work also have high student learning and wellbeing outcomes. This is because the leadership practices that reduce teacher workload are also what makes a high-performing teaching and learning environment across a school. Highly effective schools also tend to be highly efficient schools.

There is large variability in how administrative and compliance activities are managed by individual schools, and this is felt differently by their staff. The department can do more to help spread efficient administrative practices across schools. The Review has identified efficient school practices in high-performing schools and has made recommendations and suggested actions for schools as well as for the department.

Finding 5: The school-based decision model is strained

At present, schools have a high level of delegated decision making. Principals are given resources and broad guidance on their responsibilities but are expected to determine how best to meet them with some rules, support and guidance provided by the department.

Many principals are now open to removing things from their responsibility and would like to see more central standardisation of operational practices. With increasing responsibilities, having what is often described as 'autonomy' is no longer worth the extra workload. Re-assessing the school-based decision-making model could create more consistency across the system.

Finding 6: The department has had success with service-oriented supports to reduce administrative and compliance workload

The department has a number of successful workload reduction initiatives that provide models of the way forward. The department has already made in-roads in reducing school administration and compliance workload, and there is great scope to build on this success. Here is what is already working:

- Services to schools including centrally or regionally-based service teams for school minimum standards assessments, OHS, and finance.
- The no-wrong-door service provided through the Principal Advisory Service.
- Standardised policies such as the Policy and Advisory Library (PAL) and School Policy Templates Portal which have provided some standard (i.e. department policies automatically applicable to all government schools) and template policies (i.e. for schools to customise and adopt locally) that all schools can easily find and use.

However, school staff still want more service and support. Schools are dealing with more complex matters and want access to more responsive services and supports from the department in a number of administrative and compliance areas, and in ways they may not have needed before. School staff also want greater clarity about requirements. The way that program requirements and new initiatives are communicated and interpreted through several administrative layers in central office, regions and schools can lead to misinterpretation and myths about what is actually required.

Finding 7: Small schools and specialist schools have a greater challenge with administrative and compliance workload

Small schools with less than 100 students have a larger challenge with administrative and compliance workload because there are fewer staff to share responsibility. Models of cluster-based staff and governance sharing arrangements, multi-school organisations, and centralisation of operational responsibilities have already had some success and can be built upon.

Specialist schools have unique administrative and compliance challenges because of significant documentation for student needs, high staffing ratios, specialised facilities requirements, urgent and complex issues that regularly require significant paperwork, unique needs for transportation of students and issues with having to customise and adapt almost every local policy template.

Top categories of issues

Some administrative and compliance activities were particular sources of frustration. While school staff identified a range of concerns, some areas were consistently or particularly challenging for school staff. These were:

- **Facilities and asset management:** Principals have delegated responsibility for school asset management – this includes managing maintenance, data entry on facilities, employing contractors, writing grants for building upgrades, and more. This workload takes a significant amount of time and appears to be uniquely large in Victoria compared to other states.
- **Information technology (IT) frustrations:** Challenging IT systems (such as AIMS and CASE21, eduPay) and a lack of interoperability – including with third-party student management systems – create inefficiencies, leading to double-handling and increased work.
- **Documentation for individual student learning, health, and wellbeing needs:** Paperwork involved with supporting students with additional learning needs, wellbeing needs or disabilities – including the completion of individual education or wellbeing plans - is a growing workload concern. It is important to note that school staff concerns relate to the documentation and paperwork involved as distinct from the inclusive teaching practices and classroom supports. School staff want to make sure resources go to supporting these students in the classroom and that the documentation is purposeful, efficient, and not duplicative. Schools are increasingly taking on roles akin to case management for students and families – assessing need, helping with funding applications, and liaising with external agencies.
- **Less common but stressful situations which are linked to complex processes:** Sensitive and complex issues such as OHS incidents, WorkCover, performance management, student behaviour, and parent complaints were commonly identified as workload-intensive processes.

Recommendations

System change is needed

The Review makes specific recommendations and practical actions that can be taken to reduce the level of administrative and compliance activities in schools. But broader, systemic and operational change is also required.

Since the 1990s, Victoria has adopted a model of devolved decision-making that gives schools significant operational autonomy and responsibility. This is not in itself a bad thing – it empowers staff and allows schools flexibility to cater to the specific needs of the communities they serve. However, since that model was first adopted, the environment schools operate in has become more complex. This changing environment has come with some additional supports for school staff and students – for example, new programs and funding focussed on mental health in schools and OHS supports for small schools.

The Review considers that the devolved model as it relates to administrative and compliance activities needs to be revisited, as the relative costs and benefits of the approach have shifted over time as the volume of responsibility school staff are subject to has increased. At times, this has been particularly felt by principals, who have significant responsibilities, and currently serve as the ‘funnel’ between the department and the rest of the school through which all things must flow. The current approach is no longer optimal, for the schools, their staff, or the education system overall.

The Review recommends that the department reallocate some responsibilities away from individual schools and to the centre or mediating layers. These responsibilities include asset management and complex HR and people management. In addition, the Review recommends the department develop a measure of administrative and compliance activity for schools or school staff and use it to inform both reductions in existing levels of administrative and compliance activities and to manage the inevitable future introduction of new activities. Internal processes should be set up to ensure consistency of application, and reduction targets would help drive action.

Recommendations for schools

The Review also recognises that the department is not entirely responsible for the current situation, and it cannot fix everything on its own.

School staff – especially school leaders – also have a role to play. As the report makes clear, some schools are much better at managing administrative and compliance requirements than others. These schools have developed and implemented what the Review calls ‘efficient practices’ – systems, processes, actions and behaviours that manage administrative and compliance activities efficiently and effectively, shielding and buffering staff from unnecessary tasks or inefficient practices. More schools should adopt these practices, and the department should assist in collecting and sharing best practice.

In addition, many schools underinvest in administration and support staff. The Review heard that some principals are reluctant to spend money on things that may be perceived as not directly contributing to a school’s teaching and learning activities, but the consequence is teachers and principals being drawn away from teaching and learning activities to do administration and compliance that can – and often should – be done by support staff. The department can help to address this by publishing better advice on appropriate school staffing structures and budget allocations to administration and support staff.

It is also apparent from the Review’s work that school staff are doing more than what is actually required of them. The department can help clarify both what is and what is not required. In some cases, the department should create clearer exemplars and even recommended maximums to encourage schools to reduce workload. However, it is also the responsibility of school leaders to regularly review and simplify their systems and practices.

External drivers

The level of administration and compliance required of school staff is also contributed to by other departments, regulators, laws and governments. While the Review has not directed recommendations to them, it has identified considerations that the Minister, the department or others may wish to pursue.

Creating measurable and sustainable change

The rise in volume and complexity of administrative and compliance activities usually happens gradually and without deliberate planning. The department needs to have measures and processes for ensuring that administrative and compliance workload decreases and does not creep back up over time.

What gets measured, gets managed. It is important to have simple measures of performance at the system level that can be used by the department to monitor improvements over time. This is important for any cost-benefit analysis as well, because it is impossible to evaluate cost-benefit without proper measures.

The Review also found that it is important to establish an organisation-wide mechanism to continuously evaluate new administrative and compliance requirements. The department needs to establish strong, consistent governance arrangements for ongoing monitoring and reduction of administrative workload, to ensure that this issue remains a continuing focus alongside other priorities.

The Review recommends that the department:

- add a measure of administration and compliance workload to the School Staff Survey
- track the stock and flow of administration and compliance requirements
- set annual targets for reduction in non-regulatory administration and compliance hours

- standardise customer service data measures across the department to enable comparison across all key systems and functions and collecting and reporting to senior leadership
- institute a new stage gate process for changes to processes, systems and requirements designed to minimise and prevent additional administrative burden, ensuring that the process is mandatory not advisory, and applies to all parts of the department.

List of recommendations

Recommendations relating to allocations of operational responsibilities

1. **Reallocate operational responsibilities away from individual schools:** Recognising that principals' primary expertise is teaching and learning, the department should reallocate responsibilities that can be more efficiently and effectively delivered and overseen by regional or central staff. The department can undertake this work by considering the costs and benefits of centralising various functions.
2. **Track administration and compliance workload and set improvement targets:** Recognising the value of continuous improvement based on quantitative data, the department should implement standard customer service measures which are comparable across core central services provided to schools (human resources, information technology and facilities management) and set annual improvement targets overseen by the department's senior executive.
3. **Establish a team with authority:** Designate a team in the department to set targets for administrative and compliance workload reduction and monitor the administrative impact of new programs and policies.

Recommendations to better support principals

Facilities and grounds

4. **Reallocate more asset management responsibilities from schools where appropriate:** To support principals to prioritise the daily management of school operations, increasingly move most asset management responsibility (including AIMS) away from schools in favour of corporate or regionally based staff. These staff would then take over the delivery of these responsibilities, similar to models in some other jurisdictions. This may include a staged approach which takes into account school size, level of administrative burden, costs, and risk of centralising various functions over the short, medium, and long term.

People management

5. **Centralise complex HR:** Where complex human resource and workers compensation matters (such as staff conduct and performance) are resource intensive or require specialist expertise, provide or expand central services that manage individual cases on the school's behalf.

School Planning

6. **Simplify school planning documentation:** While recognising the importance of school planning, simplify school planning documentation. This includes shortening Annual Implementation Plans (AIPs) and School Strategic Plans (SSPs) and removing the need to report specific expenditure information in these documents given financial accountability is assured through other processes.

Small schools

7. **Expand central and cluster models for small schools:** Given the diseconomies of scale in the operation of small schools, introduce/expand centralised and/or cluster-level structures which take on operational, compliance and governance responsibilities, and free small school principals to focus on daily school management.

School councils

8. **Reduce the number of school council meetings and tighten school council scope:** While retaining parent and community engagement in school operations and strategic direction, reduce the number of

required school council meetings to a maximum of 5 per year and confine the scope of school councils to improve consistency across all schools.

Specialist schools

9. **Create dedicated expert resources to assist specialist schools with compliance:** Recognising that specialist settings are subject to compliance requirements greater than mainstream schools, invest in the specialist areas in the department that can support specialist schools with their administrative and compliance activities, including the customisation of standard departmental policies.

Recommendations to support teachers and other classroom-based staff

Mandatory Training

10. **Reduce mandatory training modules and replace recurring training with annual assessment:** To reduce time spent on low-impact compliance training, replace recurring compliance and training module requirements with a short annual assessment that helps teachers identify where there are gaps in their required knowledge, and remove requirements for schools to track mandatory module completion.

Compliance requirements for students with additional needs

11. **Consolidate student documentation into one plan:** Victoria should move to a One Plan model (similar to South Australia) to consolidate individual student learning, health, and wellbeing plans in a single purposeful, efficient and distinct document.
12. **Remove 'recommended' Individual Education Plan guidance:** Where Individual Education Plans (IEPs) are not mandatory, make it clear to schools that they do not need to be completed. For mandatory plans, ensure that there is clear guidance on required detail or length (e.g. number of pages/words).

Reporting, data collection and lesson documentation

13. **Simplify semesterly reporting:** Schools all do reporting differently, so there is an opportunity for the department to make this more consistent for schools and families. To do this, clarify what is and is not required, provide report exemplars, and recommended standard approaches to schools.
14. **Provide coaching to schools with high administrative workload:** Recognising that efficiently managing essential compliance and administrative activity can require expertise in process change, provide on-the-ground coaching for schools experiencing high administrative burden to assist in improving systems, particularly focusing on addressing teacher workload in data collection, scheduling and lesson planning.
15. **Clarify expectations and create more standard approaches:** Specify what is and is not required in policies related to documentation of curriculum and assessment in schools. Provide exemplars of efficient lesson planning, assessment, and data collection practices which are used in high-performing schools to both reduce administrative workload as well as improve teaching and learning.

School excursions

16. **Remove travel application for excursions:** To minimise administrative disincentives for school excursions, simplify or remove additional travel application requirements for interstate travel, and streamline approaches for applying for international travel.
17. **Simplify excursion paperwork:** Restructure risk-management procedures by providing pre-filled excursion templates and risk assessments and significantly shorten compliance documents to reduce teacher burden.

Teaching and learning administrative support

18. **Provide administrative support for teacher teams:** Use the department's Workload Reduction Fund pilot, '*Operational Teaching Assistants*', to inform models for providing administrative support for all teachers, including the appropriate level of resourcing required to materially reduce workload (i.e. the number of ES staff that might be required per teaching team).

19. **Implement an education support staff strategy:** Develop a workforce strategy for ES staff that clearly articulates the types of support roles and how they contribute to better management of administration and compliance and employment pathways.

Digital systems

20. **Provide a department-wide student information system:** Noting the potential administrative and compliance efficiencies from streamlined digital process, provide a department-wide student information system that is consistent for all schools and removes duplicative data entry for teachers.
21. **Integrate functions:** Integrate incident reporting, student data entry, and student reporting into a consistent information system to reduce duplication.
22. **Provide a student wellbeing system:** Provide school staff with a secure and integrated system for student health and wellbeing case note management, Student Support Service (SSS) referrals, and related reporting, to reduce double-handling of information across systems.

Recommendations to support business managers and administrative support staff

Digital systems and support helpdesks

23. **Improve helpdesk supports:** Undertake a review of human resource, information management and technology, and physical school infrastructure support systems with the objective of designing more timely, responsive, accurate, and service-oriented practice, including provision of no-wrong-door helpdesks.
24. **Modernise systems:** Upgrade key information technology systems, in particular CASE21, to improve user-friendliness, reduce double-handling of information, and increase reliability and efficiency.

Professional learning

25. **Develop administrative capabilities in schools:** Design professional learning programs to support business managers and administrative ES staff to best perform the core school operation functions across finance, information technology, occupational health and safety and teacher support.

Enrolments

26. **Digitise and centralise elements of the enrolment process:** To reduce and streamline school enrolment administration, continue and expand the Student Insight Pilot and remove secondary transition from primary school responsibility.

Recommendations relating to all school staff

Input into policy

27. **Add questions to the School Staff Survey to monitor administrative and compliance:** Recognising the experience and operational expertise of school-based staff, expand the School Staff Survey to gather feedback from all school staff about administration and compliance issues, including feedback on school-based and departmental decisions.
28. **Consolidate surveys and evaluations into an opt-in model:** Reduce the frequency of subject specific survey or evaluation input requests by consolidating approaches to staff feedback in a single opt-in model, similar to the Engage Victoria platform.

Implementation actions for consideration

There are a range of actions outlined below and again in the body of the report that the department can take to respond to the key findings of the Review. These are not formal recommendations, but the Review offers them for serious consideration by the department. The Review does, however, recognise that there may be alternative approaches to achieving their objectives.

Key area	Actions for consideration
Administrative support in schools	<ul style="list-style-type: none"> • Develop a workforce strategy or plan for ES staff that clearly articulates the intended scope of each type of ES staff role, including how each can contribute to better management of administration and compliance. The plan should set out initiatives and policy changes to remove existing barriers, build capacity, and encourage better practice, including: <ul style="list-style-type: none"> ○ building on the existing Dimensions of Work – Education Support Staff and the more detailed teacher work requirements to clarify the roles, responsibilities, and administrative work allocations of different categories of ES staff ○ creating signals for school principals (including financial, policy and advisory signals) to employ additional administration staff, including executive assistants to principals ○ providing clearer guidance on appropriate administration and compliance resourcing for schools of different sizes, types and circumstances ○ setting a target for an appropriate percentage of a school's SRP (and/or an appropriate proportion of FTE) to devote to administration ○ working with the higher education and VET sector to create stronger training pathways for ES staff roles ○ encouraging school principals to adopt employment models for classroom-based ES staff that provide adequate paid time for administrative duties while supporting flexible work options such as part-time and work from home ○ creating more opportunities for professional development, mentoring programs and/or professional networks for ES staff of different role types to facilitate enhanced knowledge sharing, skill development, and support across schools ○ piloting models for greater sharing of ES staff resources between schools. • Support and resource schools to provide access to administrative support for all teachers, with a team-level model of one ES staff per teacher team. • Build the capability of business managers and administrative ES staff by: <ul style="list-style-type: none"> ○ piloting the introduction of Chief Operating Officers (or Directors of Operations) in medium to large schools or networks of schools ○ developing a Business Manager and Administration Page, modelled on the Principals Page, to provide relevant updates, resources and easy to find information ○ raising awareness that the Principal Advisory Service is currently available to Business Managers and rename it to the Principal and Business Manager Advisory Service, to provide business managers with ready access to timely support and information across all areas of their work.
IT Systems	<ul style="list-style-type: none"> • Develop a strategy for replacement of digital systems that are reaching the end of their useful life, prioritising CASE21, VASS, SOCS and Recruitment Online (ROL). • Redesign or upgrade more recently established existing systems to reduce administrative burden and improve user experience, prioritising AIMS, eduSafe Plus, Strategic Planning Online Tool (SPOT), and the Disability Inclusion portal. • Deliver a common school management system experience for school staff, prioritising the standardisation of systems to support high administration tasks such as monitoring of attendance and behaviour, and student assessment and reporting.

- Digitise processes with significant paper-based or manual components, prioritising individual student planning, including for Disability Inclusion; excursions and camps; enrolment (including Year 7 transition); preparation of risk assessments and risk registers; HR record keeping; generation and distribution of contracts of employment; school council elections; local maintenance requests; and facility-specific safety and management (e.g. laboratory, library, kitchen, etc).
- Investigate options to enhance integration and interoperability between key systems (especially between AIMS, eduSafe Plus, and CASE21) with the central objective that no school staff member should have to enter the same information into an information system more than once.
- Introduce stronger internal policy and governance controls to prevent further development of disconnected systems and platforms by the department and individual schools.
- Gradually move schools toward a more limited choice of preferred third-party systems and invest in stronger interoperability across a more limited suite of tools (for example, through common data standards).
- Move to a single unique student identifier across all department and portfolio agency digital systems to simplify student data management, reduce manual cross-checking, and improve data accuracy.
- Ensure that all digital systems support appropriate delegated access for assistant principals, business managers and other staff so they can complete all required tasks and functions without using principal login details or requiring principal involvement in every decision.
- Develop and share with school staff a series of product roadmaps for major digital systems. Enable school staff to suggest improvements when drafting roadmaps and embed collaborative practices that see school staff working with department staff on redesigned functionality.
- Make reducing or better managing administrative work an explicit objective of all projects for new or upgraded school-facing systems and collect data that enables evaluation of success.
- Remove forced password change requirements in line with evidence on risk.

Camp and excursion paperwork

- Remove the separate travel application requirement for interstate and international camps and excursions.
- Expand scope of local excursions paperwork reduction to cover other small outings and low-risk excursions and reduce risk assessment requirements for these low-risk excursions.
- 'Right size' the administrative and compliance activity depending on the scale and risk of the camp or excursion activities and provide examples demonstrating to school staff the level of content required in common forms.
- Review the cost-benefit of requiring the Student Activity Locator be completed for all low-risk excursions.
- Give all school-based staff automatic access to the Student Activity Locator removing the need for access requests, wait time and approvals.
- Reduce camp and excursion risk assessment documentation to one page, highlighting most critical risks and mitigations. Deliver a digital camps and excursions tool, including automated workflows and standard pre-filled risk templates.
- Reduce duplicative compliance requirements for camps and excursions. For example, allow school staff to use existing plans for individual students, such as

	<p>Individual Education or Behaviour Support Plans for camps and excursions, rather than creating new documents for this purpose, adding in alterations if required.</p> <ul style="list-style-type: none"> Adapt the excursion policy for specialist schools, in recognition that students in these schools have detailed existing documentation that address risks to their safety and wellbeing, including day-to-day adjustments in a range of contexts and environments. Permit specialist schools to refer to existing plans and documentation and only prepare additional information on excursion-specific matters not covered elsewhere.
Compliance requirements for students with additional health, wellbeing and learning needs	<p><i>Administration associated with working with external systems and supports</i></p> <ul style="list-style-type: none"> Remove the requirement for school staff to apply for a Community Liaison Officer (CLO) and instead offer CLOs to willing schools, allocating CLO time fractions based on Australian Bureau of Statistics or CASE21 data. Reallocate CLO-related accountability processes to regional staff. Pre-populate LOOKOUT digital data collection with known student details. Direct SSS and school staff to not begin an Educational Needs Analysis (ENA) for students in Out of Home Care (OoHC) until SSS has capacity to begin the assessment. Begin the ENA process by collecting existing documents to reduce duplication of effort. Develop a light-touch mechanism for school staff to access the 'queue' for supports such as SSS. Provide more guidance and practical advice to schools on expectations and appropriate boundaries in working with third parties including issues of access and task allocation. Work with relevant agencies to develop a new multi-agency agreement and strategy focused on improving how staff collaborate across the education, health, care and justice systems. The strategy should commit to specific actions which balance workload concerns and improve clarity and collaboration between staff from different organisations, for example: <ul style="list-style-type: none"> streamlining documentation and developing common forms and templates cross-agency training for staff in understanding each other's operating context establishing communication norms. <p><i>Disability and inclusion administration</i></p> <ul style="list-style-type: none"> Ensure all resources to support the Disability Inclusion Profile (DIP) process are available in one place on PAL. Conduct profile meetings on the assumption that all present have read and accepted the contents of all documentation. Amend the DIP review process to only focus on changes that have been made to a student's adjustments (increase or decrease) since their initial DIP was developed. Work to increase community sector agency understanding of DI reforms and the DIP criteria, reduce friction in interactions between schools and agencies, and combat potential misinformation about the initiative being shared to parents by external agency workers. Designate a team in the department to specifically support specialist schools with their unique administrative and compliance challenges. Allow sufficient flexibility in the requirement for IEPs and Student Support Groups (SSGs) for students based on their background or circumstances to allow for student

	<p>and family input to reduce documentation requirements for students who do not require additional intervention.</p> <ul style="list-style-type: none"> • Investigate options to provide additional administrative staff to mainstream schools with high enrolments of students with additional needs, in particular to support other staff to manage the administrative burden of NDIS and external agency requests for support from or access to schools. • Investigate options to streamline the DIP process in secondary schools with a particular focus on reducing the need for multiple subject specialist teachers to separately prepare similar documentation for every student. • Investigate options to streamline the DIP process in specialist schools, particularly when students meet extensive criteria across multiple categories of need and were assessed as such to enrol at a specialist school. • Drawing on efficient administrative practices in highly effective schools, provide more guidance to schools on how they should allocate funds and design roles to reduce the workload impacts of the DIP process, with specific advice for schools of different sizes, types and contexts. • Design and pilot a cluster support model to support the administrative workload of the DIP across groups of small schools, for example by resourcing a shared inclusion leader and supporting team. • Provide school staff with a secure and integrated system for student health and wellbeing case note management, SSS referrals, and related reporting, to reduce double-handling of information across systems.
Compliance training and mandatory modules	<ul style="list-style-type: none"> • Remove tracking of mandatory module completion from school responsibility and automate reminders about training requirements to staff.
Occupational Health & Safety and Workers' Compensation	<ul style="list-style-type: none"> • Consolidate risk assessments and create additional standardised risk assessments for common activities to reduce time spent on this task. Provide additional on-the-ground support services to schools to complete risk assessments. • Streamline, standardise and connect safety-related digital reporting systems (including eduSafe Plus and CASE21) to reduce double-entry of information, minimise administration time, and replace complex medical or technical terminology with simpler language.
Managing performance and conduct issues	<ul style="list-style-type: none"> • Overhaul the administration of time in lieu to create a simplified, consistent approach across all schools. • Conduct a thorough review of all HR policies and supporting resources to reduce length and complexity, remove inconsistencies, and update broken links. Once complete, institute a rolling user experience review of all HR policies and supporting resources to maintain quality. • Take steps to improve the consistency of HR advice, including using Artificial Intelligence (AI) tools and developing a formalised HR knowledge-sharing intranet site for principals, business managers and school HR administrators. • Set a target for digitisation of remaining hard copy personnel files for current employees and provide a system for timely and seamless transfer of digital records when staff move between schools.
Recruitment and induction administration	<ul style="list-style-type: none"> • Develop clearer guidelines and flowcharts to help school staff manage international recruitment and pre-service teacher placements.

	<ul style="list-style-type: none"> • Improve ROL to make the platform more user-friendly, streamlined, and accessible to international candidates. • Develop a system to automatically send contracts out to new hires to significantly reduce or remove this workload from school staff. • Offer a centralised recruitment option for schools to opt into if it suits their needs, in particular for harder-to-staff schools. • Remove the requirement for applicants to prepare written responses to Key Selection Criteria (KSC).
Performance and development	<ul style="list-style-type: none"> • Permanently adopt the Statement of Expectations (SOE) process as the primary performance and development tool for all school staff and formally retire Performance and Development Plans (PDPs).
Policy, compliance support, and school review	<ul style="list-style-type: none"> • Work with the Victorian Registration and Qualifications Authority (VRQA) to increase the number of default departmental policies that, for the purposes of compliance with Minimum Standards, can apply to all schools without local adaptation. • Significantly reduce the administrative workload required for financial accountability (both in SPOT and the Schools Targeted Funding Governance (STFG) portal) in relation to small program-specific funding allocations (e.g. up to \$25,000) to ensure workload is proportionate to the amount of funding provided. • Further reduce the number of audits and assurance activities conducted in a single school year. • Reduce the number of audits and assurance activities that contact individual schools by using more central data to identify irregularities and better target audit activities to areas of concern. • Lower the stakes of minor audits (e.g. of tree or ramp safety) by rebranding them as routine inspections or checks and emphasising a focus on practical improvements rather than procedural compliance. • Modernise school council election processes by updating Ministerial Order 1280 to permit electronic voting and providing a common electronic voting system. • Simplify SPOT by removing funding fields and adding pre-fill and dropdown options to speed up documentation. • Work with school staff to design a new approach to communicating the list of PAL updates each term, to address the perception that the list requires principals to read and action dozens of items. • Invest in teams to provide additional practical, hands-on support for the pre-review self-evaluation and audits, based on the successful School Compliance Unit model to support schools with minimum standards compliance. Update procedures to include a suggested maximum time school staff should expect to spend completing and preparing for these activities. • Reduce the size of AIPs and SSPs to approximately 2 pages. • Reduce required school council meetings to 5 per year and explicitly restrict the scope of school councils to core duties. • Investigate further separation of the compliance and performance components of the School Review by offsetting the 2 components by 12 months.
Procurement	<ul style="list-style-type: none"> • Increase resourcing for procurement and legal teams to enable expansion of available panel categories and reduce procurement administration requirements in

	<p>common spending categories. Consult closely with a range of school staff (including when selecting suppliers) in order to align new panels to school requirements.</p>
Finance	<ul style="list-style-type: none"> • Review financial requirements against red tape reduction principles to reduce workload that is not purposeful. As part of this, review commonly frustrating issues like: <ul style="list-style-type: none"> ○ requiring school staff to get principal and school council sign off on every transaction ○ requiring banking be conducted with particular banks that are not accessible in regional areas and/or requiring banking to be conducted on a fixed schedule ○ barriers to buying small dollar resources without advanced paperwork ○ the multi-step process for purchase orders. • Investigate options to allow schools to operate on a single financial year rather than producing duplicate financial information to align with calendar and financial years in different circumstances. Conduct any 'translation' activities between calendar and financial years at the system level, where these are required (e.g. for audits or whole of government financial reporting). • Open up the School Administrative Support Hub (SASH) to larger schools that would like to outsource financial tasks.
Asset management	<ul style="list-style-type: none"> • Support schools to streamline Essential Safety Measures (ESM) by integrating rectification tasks directly into the ESM audit process (for example, advising schools how to use the same contractor manage both inspections and follow-up corrections). • Improve VSBA customer service with the aim of preventing administrative workload for schools: <ul style="list-style-type: none"> ○ set clear response timelines and service standards for different types of VSBA projects ○ ensure all VSBA policy requirements and guidance materials are documented on PAL and not through the Asset Information Management System (AIMS) ○ create a single point of contact for school staff with general asset management enquiries, modelled on the Principal Advisory Service ○ designate client managers for each school who can build familiarity with local issues and relationships with school staff ○ establish a function tasked with intervening early to resolve disputes before they escalate. • Resource the expansion of the Small Schools Program to support small and medium sized schools which do not have the resources to staff for asset management, workers compensation and OHS responsibilities. • Review AIMS notification settings with a goal to significantly reduce the number of notifications and ensure that school staff are not sent email notifications on holidays or after hours unless the issue is urgent.
Administration for complaints	<ul style="list-style-type: none"> • Require adoption of a standard complaints policy for all schools, based on the existing template policy, to ensure consistency across schools. • Develop a complaints tool kit with practical resources to support school staff to manage and resolve complaints including templates and exemplars. Consider piloting automated systems to assist in low-level complaint management.

	<ul style="list-style-type: none"> • Review the current professional learning available to school staff (all roles) in areas relevant to building positive relationships and reducing conflict, including communications, mediation and complaints resolution. • Take steps to educate the Victorian community around the purpose and role of contemporary schools, including building positive school-family partnerships, in line with efforts in health and transport sectors and in other jurisdictions.
Student transport administration	<ul style="list-style-type: none"> • Work collaboratively with specialist school staff to reduce the complexity of administration of student transport services for students in these settings, for example by reducing the number of providers or standardising the services offered (including IT platforms and customer service expectations).
Enrolments administration	<ul style="list-style-type: none"> • Ensure alignment between paper enrolment forms and digital systems like CASE21 to minimise processing inefficiencies. • Remove the requirement for the Specialist School Enrolment Verification Request form. • Review specialist school enrolment procedures with a view to reducing administrative burden. Develop clearer guidance and structured support for specialist school enrolments and help staff in these schools manage these complex processes. • Review the procedures for handling of enrolment appeals at schools where accommodation is at or near capacity and/or where appeals are frequent or complex, with a view to both reducing administrative workload and supporting the wellbeing of school staff.
Administration from planning, assessment, and reporting	<ul style="list-style-type: none"> • Codify and share effective administrative practices: <ul style="list-style-type: none"> ○ Create semesterly report exemplars that reduce teacher workload but still meet policy requirements. ○ Create assessment data collection advice on how schools can reduce data collection that they are not using. ○ Create case studies of schools that have made lesson planning documentation more effective and less administration heavy. • Clarify what is not required <ul style="list-style-type: none"> ○ In policy, clarify the details on semesterly reports that are not required (e.g. scoring on each Victorian Curriculum content description and detailed comments). ○ Clarify what assessment data collection schools are required and not required to do to encourage more consistency. ○ Clarify what lesson planning documentation is required for compliance versus what is not required. • Recommend maximum and/or standard approaches <ul style="list-style-type: none"> ○ Recommend a minimal standard semesterly report structure. ○ Recommend that schools do not require teachers upload lesson documentation to multiple portals. • Provide operating model guidance <ul style="list-style-type: none"> ○ Curate a list of third-party tools that help reduce the workload of assessment, data entry and reporting. • Intervene in schools with low shielding and buffering results

	<ul style="list-style-type: none"> ○ Identify the 5% of schools that have consistently low shielding and buffering results from the School Staff Survey and send a support team to help them establish more effective and efficient systems.
Implementing effective administrative practices	<ul style="list-style-type: none"> ● Identify and assess administrative and compliance workload issues, implement effective administrative practices, and monitor progress and communicate with staff.
Measurement and evaluation	<ul style="list-style-type: none"> ● Measure the workload impact of administrative and compliance requirements by: <ul style="list-style-type: none"> ○ adding a measure of administration and compliance workload to the School Staff Survey ○ developing a School Engagement Framework to guide the development of consistent, system-wide feedback mechanisms on administrative and compliance issues ○ requiring program evaluations to explicitly consider administrative and compliance workload impacts. ● Track the stock and flow of administration and compliance requirements by: <ul style="list-style-type: none"> ○ developing a light-touch standard model to estimate the hours of school staff administrative workload generated by any process, regardless of source ○ requiring preparation of an estimate of hours of additional workload created for all changes and new initiatives ○ reporting on trends to senior leadership. ● Continuously improve processes by: <ul style="list-style-type: none"> ○ setting annual targets for reduction in administration and compliance hours ○ establishing a regular process for department teams to nominate process improvements that could be adopted to assist in meeting the targets ○ standardising customer service data measures across the department to enable comparison across all key systems and functions and collecting and reporting to senior leadership ○ establishing a team to conduct rolling process improvement reviews and report on findings and recommended improvements to senior leadership. ● Improve engagement with school staff on administrative and compliance workload issues by: <ul style="list-style-type: none"> ○ providing an online platform (similar to Engage Victoria) where school staff can opt in to providing feedback on the administrative impacts of various initiatives, reducing the need for multiple feedback requests ○ regularly reporting back to school staff on changes made in response to their feedback. ● Minimise the development of new issues by: <ul style="list-style-type: none"> ○ instituting a new stage gate process for changes to processes, systems and requirements designed to minimise and prevent additional administrative burden, ensuring that the process is mandatory not advisory, and applies to all parts of the department ○ increasing the transition and phase-in time for changes wherever possible ○ increasing engagement with school staff, unions and peak bodies in process development at a point where meaningful changes can still be made before processes are rolled out.

Introduction

Over the past decade or so, there has been a growing sense in schools that administrative and compliance activity has become increasingly burdensome, and that the combined pressure of the activity is not only limiting the time available for tasks that directly enhance student learning and wellbeing outcomes but also contributing to declining staff job satisfaction and retention. Researchers and policymakers have been aware of this issue for some time, and several pieces of work – in both the Victorian and the broader Australian context – provide important background for the Review.

Alongside a growing understanding of the problem, there have also been efforts by the department to alleviate the pressure associated with higher volumes of administrative and compliance activity. The department has established strategies around workplace health and safety and principal wellbeing, developed pilot programs to reduce the burden, and introduced restrictions on imposition of additional activity. However, the administration and compliance workload of school staff remains significantly high, and efforts to reduce it have not sufficiently alleviated the workload pressure on school staff.

This report describes the findings and recommendations from the *Independent Review of administrative and compliance activities in Victorian government schools*. The Review was established to make recommendations on the actions the Victorian Government and schools can take to reduce and better manage administrative and compliance activities. The Review considered where different approaches may be required based on factors such as school type (primary, secondary and specialist) and context (such as geography and size).

The Review also provides advice on strategies for measuring workload and evaluating the effectiveness of initiatives to reduce administrative and compliance activities for school staff. The Review does not consider activities or challenges currently the subject of other reviews.

Methodology

The Review adopted a structured approach to identify and address the factors driving school administration and compliance activities in schools. It began with a desktop assessment of evidence-based reports, an analysis of recent principal surveys and a cross jurisdictional examination of the problem. Additionally, building an understanding of existing state and federal legislation and regulatory requirements enabled the Review to form initial hypotheses regarding the challenges faced by school staff and to theorise potential solutions.

From the outset, the Review was committed to deep and genuine consultation with school staff, including principals, mid-level leadership, teachers, and ES staff. A critical part of the Review was to define a process for developing a deep understanding of the drivers of administrative and compliance activities in schools while also capturing the lived experiences of school staff.

To engage with these staff, the Review undertook a large program of school visits, regional focus groups and online workshops that reached hundreds of school staff. Where possible, existing department engagement mechanisms were also used, to maximise the reach of the Review, give staff every opportunity to input, and minimise burden.

Consultations also included meetings with unions, professional associations, peak bodies and their various sub-groups. In addition, school staff were able to continue contributing through online forms that identified administrative and compliance issues and tested potential solutions.

Read more details of the consultations in Appendix A: About the Review.

Structure of the report

Report sections:

- Key findings
- Recommendations for the department by topic
- Efficient administrative practices in schools
- Creating measurable and sustainable change
- Considerations for external regulators and Victorian Government bodies

Key findings

This section describes 7 key findings from the Review. These are high-level findings that describe the overall situation of administrative and compliance activities in Victorian government schools. These 7 key findings are referred throughout the body of this report and provide evidence for the recommendations. These are not the only findings from this Review, as there are many detailed findings by topic in the later sections of this report. These 7 findings are the overarching findings that shape the rest of the discussion in the report.

Key findings:

- Finding 1: Administrative and compliance workload is a significant and growing workload.
- Finding 2: Administration and compliance tasks take school staff away from their core business of improving student learning and wellbeing.
- Finding 3: Administrative and compliance workload is affecting school staff wellbeing and retention.
- Finding 4: Efficient administrative practices exist in many schools, but there is variance.
- Finding 5: The school-based decision model is strained.
- Finding 6: The department has had success with service-oriented supports to reduce administrative and compliance workload.
- Finding 7: Small schools and specialist schools have a greater challenge with administrative and compliance workload.

The findings below are based on evidence collected during the Review from the following sources:

- qualitative focus groups with school staff (virtual and in person)
- school visits by the Review team
- Review survey
- submission to the Review
- interviews with department staff
- analysis of other relevant reviews and research papers on related topics.

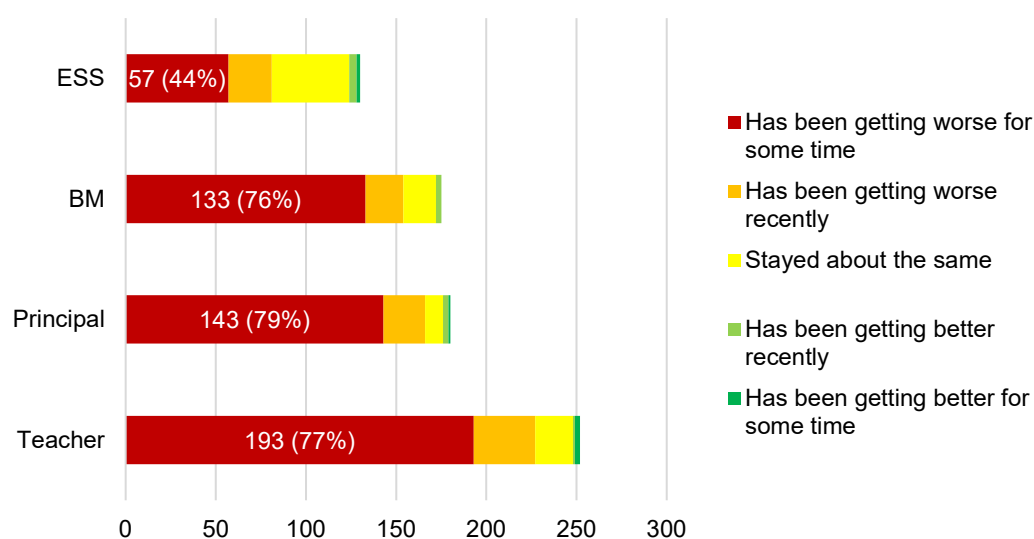
This report includes charts from the Review's survey. Details of the survey responses can be found in Appendix B: Submission and survey results. The survey results were triangulated with the other sources of evidence collected in the Review (see Appendix C: Supplementary Evidence).

Finding 1: Administrative and compliance workload is a significant and growing workload.

A key finding from the Review is that administrative and compliance workload has been growing over time. More than three-quarters of teachers, principals, and business managers who participated in the Review's survey reported that this workload had been increasing for some time, indicating that it is not a recent change, nor driven by any single new initiative (see Figure 1). ES staff who are not business managers had different opinions as they were significantly more likely to say that administrative and compliance workload has stayed about the same over time. Very few survey participants said that this workload has gotten better.

These survey results represent a small portion of all government school staff, but these results align with the other evidence collected during the Review. In every focus group and school visit, the Review heard that there has been a cumulative increase in administrative and compliance workload as new tasks get added and nothing gets taken away. There is also evidence for a sustained increase in administrative and compliance workload in department policies and programs, which have grown over time, often in response to external regulatory or accountability requirements.

Figure 1: How has your administration and compliance workload changed over time? By staff type (all staff)



Notes: BM = business managers; ESS = education support staff (excluding business managers).

There are external drivers of increasing administrative and compliance activities in schools

Some significant drivers of increasing administrative and compliance workload are not unique to Victoria or the government school sector. The Review consulted with different states and territories, and it was clear that most school staff across Australia are experiencing similar pain points with administrative and compliance work. Many of the factors are also broader than schools, for example regulatory growth impacting many industries.

Significant external drivers include:

- complexity of government regulation
- increasing external accountability and data collection requirements
- changing expectations on schools.

The growth of department programs and policies has contributed to increased administrative and compliance workload

The department creates programs and policies to continuously improve schools and student outcomes, including responding to changes in regulation and community expectations. Even when programs are well-executed with school staff understanding the rationale for each program and policy, they still usually add to school staff administrative and compliance workload. The individual pieces of work from the department may be small, such as a request for a quick survey. Others can also be larger, such as requiring a member or members of staff in every school to use a new digital platform to enter data.

New requirements compound over time to create a large workload, and it is rare to remove older requirements as new ones come into effect. While individually they may not seem significant drivers of administrative or compliance activity, schools often have to manage many new programs at the same time, and periods of high reform intensity can be challenging. Better staging individual programs, and coordinating the roll out of multiple programs, could help schools manage this better.

Finding 2: Administration and compliance tasks take school staff away from their core business of improving student learning and wellbeing

The Review found that administrative and compliance takes up time that would otherwise be used for work more directly related to improving student learning and wellbeing of students. Even though most administrative and

compliance work is important, and much is essential, it is important to clearly state that more administrative and compliance work means less time for other tasks.

The quotes below represent the tension school staff feel between doing compliance and administrative work and spending time on what they believe will make a bigger difference for student learning and wellbeing:

“Principals are desperate for more time to be involved in the core business of leading teaching and learning.” – Principal

“Principals are being removed from teaching and learning to focus on compliance. Compliance tasks take forever. Finance, Budgets, Buildings and Grounds, OHS.” - Principal

“Teachers are caught up in ridiculous amounts of administration that takes away from our core business.” - Teacher

The Review found that school staff are making trade-offs in the limited time they have about what will be the most purposeful work. School leaders generally signal what to prioritise, and their choices vary. Some school leaders are confident and skilled enough to decide what administrative and compliance work is essential, what is optional, and how to effectively meet all requirements while maintaining a focus on teaching and learning. Others are not able to figure out how to manage all of the administrative and compliance requirements and maintain educational priorities.

Administration and compliance requirements do not always lead to improved outcomes

The Review heard concerns from some department teams that reducing administrative and compliance requirements might lead to worse outcomes. However, a requirement like more documentation does not always align with better results. This report outlines the specific policies and compliance requirements that may not be designed perfectly for their purposes.

An example of a compliance requirement that may not be leading to improved outcomes is the department requirement to force password changes. This practice may appear to lead to better outcomes, but this long-established security practice is no longer recommended because it was found to cause more risk.¹

Although all administrative and compliance tasks have a good purpose, the details of the exact document or task required may be lacking evidence. This Review identifies the tasks that can be changed, simplified, or removed to allow more time for work in schools that will more directly improve student outcomes.

Teachers have particularly limited time for administrative and compliance work

Teachers have very limited time for administrative and compliance work. The current Victorian Government Schools Agreement allocates 18.5 hours per week face-to-face teaching for secondary school teachers and 21 hours per week for face-to-face teaching for primary or specialist school teachers. It clarifies the *30 plus 8* model for teacher work allocation, where 30 hours per week are dedicated to teaching-related activities such as face-to-face teaching, planning, preparation, collaboration, and assessment, with the specific duties determined by the teacher (considered high impact activities). Additionally, 8 hours per week are set aside for lunch, yard duty, meetings, and other activities.

Although 8 hours are allocated for tasks unrelated to teaching and learning, teachers report that the increasing administrative and compliance workload exceeds this time frame and is negatively impacting activities that directly affect student learning and wellbeing. The Review found that about half of those surveyed (see Figure 2) reported their administration and compliance workload to be unmanageable.

The Review found that many teachers are struggling to find time for seemingly simple administrative tasks, such as documenting student behaviour or completing cashbooks. As a result, many are forced to complete these tasks during evenings and weekends, or they opt to reduce time spent on high-impact activities like lesson planning, parent communication, or event planning to enhance student learning and wellbeing.

¹ See the UK National Cyber Security Centre's explanation of the evidence: [The problems with forcing regular password expiry](https://www.ncsc.gov.uk/evidence/the-problems-with-forcing-regular-password-expiry) - NCSC.GOV.UK

Figure 2: How manageable is your overall administration and compliance workload? By school type (teachers)

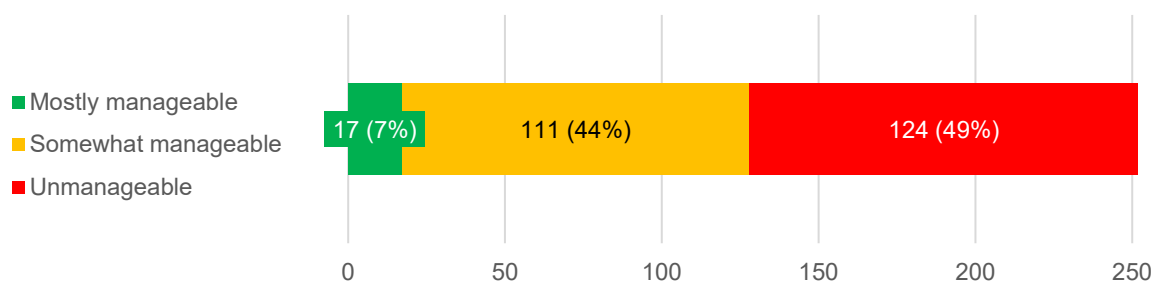
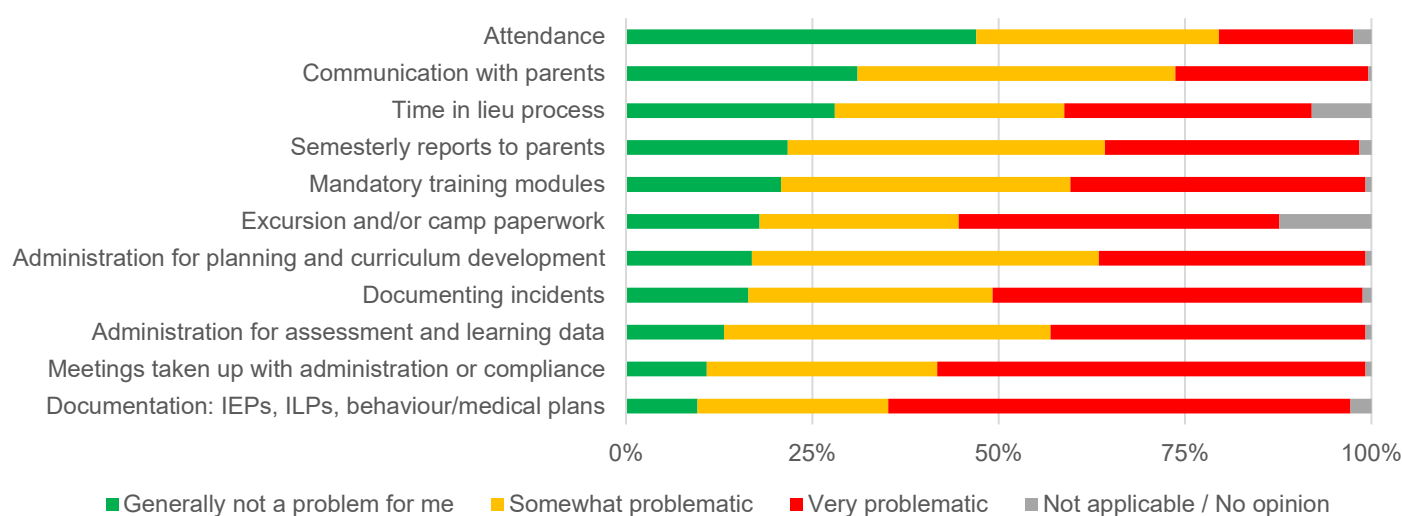


Figure 3: How appropriate is your administration and compliance workload in the following areas? (teachers)²



The Review found that the top 4 administrative and compliance issues for teachers are:

- Disability Inclusion Profile documentation for students with additional needs
- administration work in meetings
- documenting student behaviour issues
- camp and excursion documentation.

Other issues identified include:

- administration from planning and lesson documentation
- administration for assessment and reporting
- compliance training and mandatory modules
- administration to monitor attendance, suspensions and expulsions
- compliance requirements for priority equity cohorts of students.

ES staff would like to have more administrative capacity to support

ES staff in administrative roles generally told the Review that they see administrative and compliance activities as their job rather than a burden or imposition. They are motivated to come to work by a desire to support the leaders, teachers and other staff in their school to focus on the core purpose of student learning and wellbeing.

² For ease of comparison of categories, the proportion of responses of 'generally not a problem for me' and 'not applicable/no opinion' are shown as negative numbers.

However, they also made clear that many current structures, systems and processes are preventing them from supporting their colleagues in achieving this objective. They report being under-resourced in the context of expanding administrative obligations.

The top 4 areas of administrative and compliance issues for business managers and administrative support staff are:

- issues with digital systems
- facilities and grounds, including AIMS management
- occupational health and safety
- financial management.

Other common areas identified include:

- routine HR management (e.g. payroll)
- complex HR management (e.g. WorkCover cases)
- school council administration
- school local policies
- emergency management.

Finding 3: Administrative and compliance workload is affecting school staff wellbeing and retention

The Review finds that improving administrative and compliance workload can be linked to improved staff wellbeing, and therefore staff retention. A lot of work has been done prior to this Review by professional associations, unions and researchers to draw attention to all workload issues, which includes administrative and compliance workload.

As described throughout this report, the Review recognises that much of the added administrative and compliance workload is based on well-intentioned efforts to reduce risk and improve safety and student wellbeing outcomes. However, when the combination of these tasks results in a large workload, there is a risk that teachers and staff will leave the workforce and schools will be understaffed. All safety and compliance measures will be significantly less effective without skilled staff that know the students and families through multiple years of service at the same school.

In general, more administration and compliance workload leaves school staff feeling like they do not have enough time for their core work of teaching and learning. This makes their jobs less purposeful and leads to a higher workload, risking the ability to retain staff in schools.

School staff are taking work home

Principals have a large responsibility for managing an organisation, and they often have roles like front-line workers dealing with regular crises. They often do not have buffered periods of time to work continuously at their desks because there are constant interruptions. This means that many principals take home administrative and compliance work plus strategic and planning work. Some of the urgent situations that principals deal with generate further significant administrative and compliance work. For example, if there is an issue with a parent conflict or complaint, there can be a large amount of paperwork to manage, and the situation can sometimes go on for a long time. These long-term, complex administration scenarios can be both very time-consuming and very stressful because of the seriousness of the situation.

Teachers report that the administration and compliance work they cannot complete during the day has to be done on evenings or weekends. Teachers often want to prioritise work with students, families and colleagues during the school day and do not always have time to complete the administrative work.

ES staff, including business managers, are often stopping work to respond to incidents or issues that regularly come up during the school day. This starting and stopping work can lead to having to take work home. Business managers sometimes have to work unexpectedly on school holidays or weekends to finalise administrative work or respond to a facilities issue at the school.

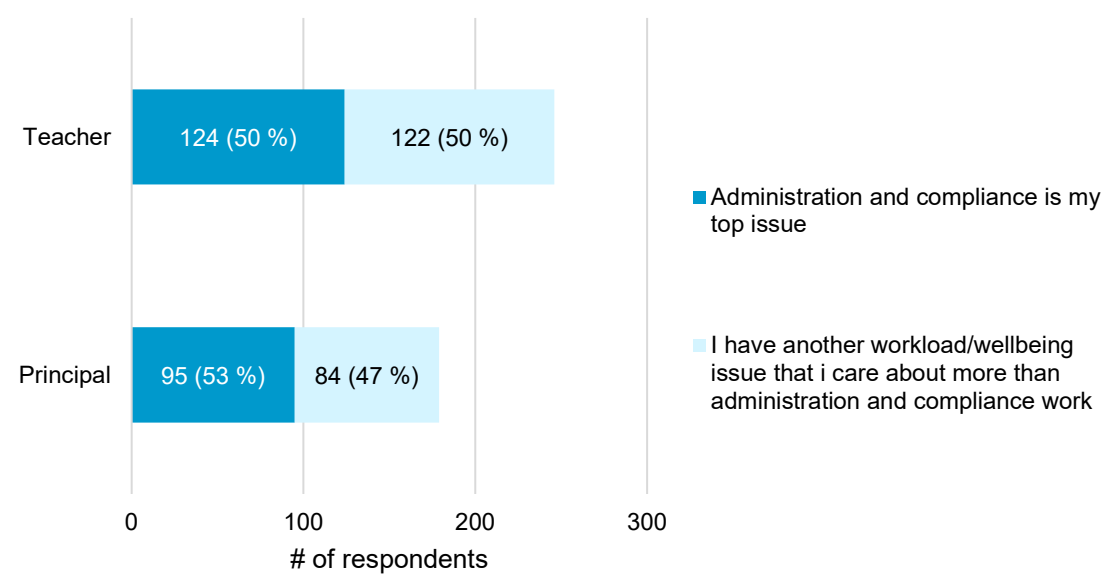
“I feel like I am running a race every day - trying to get as much done as possible - the to do list feels like a bottomless pit - I feel like the meat in a sandwich between the school and the department - workload is so high, I feel I am set up to fail, I feel like I will get in trouble or look incompetent when I inevitably make a mistake.” - Business manager

About half of teachers and principals say administrative and compliance work is their top workload issue

50% of teachers and 53% of principals who participated in the Review’s survey say that administration and compliance is their top workload concern (see Figure 4). This aligns with the feedback from focus groups and school visits. For many teachers and school leaders, there are other workload concerns that are more important. However, for about half of government school educators, implementation of the recommendations in this Review would address their primary workload concerns.

The Review also found that there is a perception by teachers that administration and compliance workload is high for school leaders, and this contributes to a reduced teacher interest in a career pathway to principalship.

Figure 4: Is administration and compliance your top workload and wellbeing issue? By staff type. (Teachers, principals)



High stress, high administration work is a major issue

It is clear that complex situations with staff performance management, parent conflict or complaint, extended WorkCover claims, and serious student behaviour matters are high stress situations and also come with complicated and detailed paperwork. These are the issues that tend to drive principals and other school staff to want to leave the profession.

Increased stress and workload can lead to staff attrition

In recent years, a growing body of research has revealed a general perception that the work of school staff has shifted, with a skew towards heavier and more complex workloads.³ At the same time, the link between rising

³ Department of Education, Australian Government (2022) *Teacher Workforce Shortages Issues Paper*.

workloads and adverse health and wellbeing outcomes continues to be substantiated in the literature, with secondary effects on student learning.⁴

Stress is a critical factor contributing to poor health and wellbeing outcomes for school staff, particularly for principals, who face job and emotional demands much higher than the general population. According to the 2023 VAGO report on Principal Health and Wellbeing, principals are more than twice as likely to experience difficulty sleeping and report emotional demands at a rate 1.7 times higher than the general population.⁵

Workload is an increasingly prevalent concern for school staff and has been widely cited as a chief factor in job satisfaction. Research commissioned by the Australian Education Union found that school staff work a substantial number of unpaid hours, with principals reporting an average of 17.5 extra hours per week.⁶

The distribution of principal time across the breadth of school operations is also significant. The Review heard evidence from the department that the proportion of school staff in leadership roles has declined over the last 25 years, which has weakened the capacity of schools to manage rising workloads as leadership roles typically take on the majority of more complex administrative and compliance duties in order to protect teachers' time to focus on core student learning and wellbeing objectives. The department has taken steps to reverse this decline in recent years through the Workforce Planning Initiative (see Appendix D: Case Studies).

These (and other) factors have cumulatively contributed to rising staff attrition rates across schools in Australia. The Victorian Teacher Supply and Demand report 2022⁷ showed rising levels of workforce attrition while workforce shortages have been identified as one of the single biggest issues facing schools and school systems across Australia.⁸ A recent survey found that 40% of education staff in Victoria are uncertain about continuing to work in Victorian public schools, citing excessive workloads as the most prominent reason for stopping work.⁹

Finding 4: Efficient administrative practices exist in many schools, but there is variance

A positive finding from the Review is that many schools already have systems and structures that reduce administration and compliance workload for staff. Some schools are so efficiently run that teachers and ES staff reported virtually no concerns with their administrative workloads. These schools have 'efficient administrative practices' across many categories of work, including meetings, planning and lesson documentation, assessment and data collection, semesterly reporting to families, managing student attendance, and using administrative support to reduce teacher workload. The report section describes the efficient administrative practices identified by the Review in more detail.

Some schools the Review visited had strong internal systems, had hired additional administrative support, and as a result had teachers who were generally satisfied with their administrative and compliance workload. This shows that it is possible to reduce the teacher administrative workload with the right leadership and operational structures. However, the Review cautions that schools - and school leaders - are not solely responsible for figuring out how to establish strong systems. The department has an important role to play in spreading these efficient administrative practices and removing the barriers to implementing them in all schools.

The schools that have been successful in creating an efficient administrative culture usually have:

- strong internal structures
- clear roles and responsibilities
- clear priorities and are unwavering about sticking to them
- hired additional administrative staff to take work off teachers
- principals who are confident enough to exercise judgement in managing external requests.

⁴ Creagh, S. et al. (no date) 'Workload, work intensification and time poverty for teachers and school leaders: a systematic research synthesis', *Educational Review*, 0(0), pp. 1–20.

⁵ <https://www.audit.vic.gov.au/report/principal-health-and-wellbeing>

⁶ Longmuir, F. et al. (2024) *Work in Victoria's Public Schools*. Australian Education Union.

⁷ Department of Education (2022) Victorian Teacher Supply and Demand Report 2022

⁸ Department of Education, Australian Government (2022) *Teacher Workforce Shortages Issues Paper*.

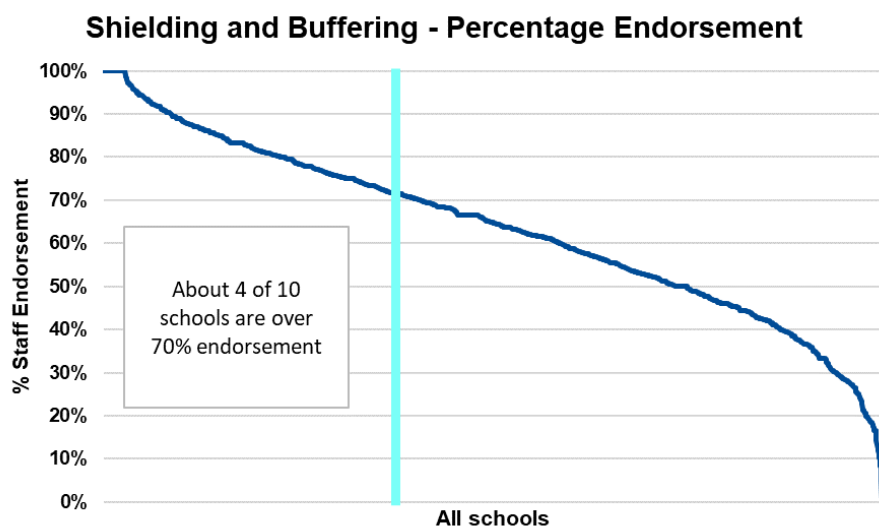
⁹ Longmuir, F. et al. (2024) *Work in Victoria's Public Schools*. Australian Education Union.

Schools vary in how staff are shielded from excess administrative and compliance workload

Consultations showed that staff in different schools have varied experiences of administrative and compliance workload. This is also evident in the School Staff Survey shielding and buffering data which varies across schools (as shown in Figure 5 below).

Teacher administration and compliance workload can be mitigated by school-based decisions around systems, leadership structures, and prioritisation. There is therefore large variation between schools in how well teachers are shielded from excessive administration workload. On the School Staff Survey there is a measure of 'Shielding and Buffering' which shows this variation.

Figure 5: Details of Shielding and Buffering domain in the School Staff Survey¹⁰



Notes: See Footnote 10 for more details about this measure.

The 'Shielding and Buffering' measure is the best proxy the Review could find for measuring administrative and compliance workload for school staff. It is not perfect. Some principals would say that teachers do not realise how much they are being shielded and therefore will not reflect this on the survey. However, the variation on this survey measure aligns with what the Review found in the consultations: that there is substantial variation between schools in how teachers experience administration and compliance workload. The Review has recommendations for improving measures of administrative and compliance workload.

Schools that shield and buffer teachers have high student learning and wellbeing outcomes

An important finding of the Review is that schools with efficient administrative practices also often have high student learning and wellbeing outcomes. This is because the leadership practices that reduce teacher workload are also what makes a high-performing teaching and learning environment across a school. What is good for teachers is also good for students and families.

Analysis of department data shows that, on average, high-performing schools (in both student learning and wellbeing) also have better shielding and buffering scores on the School Staff Survey. This suggests that practices that reduce administrative workload for teachers are also often the same things that improve teaching and learning across the school. This is consistent with the idea that effective principals create consistent systems and structures and are clear about priorities.

Key findings:

¹⁰ To calculate shielding and buffering, questions cover whether:

- staff and teachers are protected from internal issues that disrupt teaching
- staff are protected from interruptions to their teaching time
- staff are protected from external issues that would distract from their emphasis on teaching.

These questions are rated on a scale of 1-6 with 1 being 'strongly disagree' and 6 being 'strong agree'. The percentages in Figure 5 represent the % of staff at each school that answered 'agree' or 'strongly agree' (ratings of 5 or 6). Endorsement is taken as 70% at either agree or strongly agree; on this basis, about 4 of 10 schools endorse the degree of shielding and buffering.

- 'High' performing schools in student learning and wellbeing on the department's performance framework have better shielding and buffering scores compared to 'Developing' schools.
- There is no statistical association between shielding and buffering scores and Student Family Occupation indices (SFOE) and a school's level of Social Disadvantage Funding (SDF), calculated on the Student Family Education and SFOE indices. This means that, on average, similar proportions of staff in high and low SFOE schools reported good shielding and buffering at their schools.

Further details of this analysis are at Appendix B: Submissions and survey results.

Principal capability impacts the variation between schools, but it is not the only factor

The Review found that school leaders who set up efficient systems often are strong at improving student learning and wellbeing as well as reducing administrative and compliance workload for teachers. There is, therefore, an element of principal capability leading to different administrative workload outcomes in different schools.

It is important to build principal capability on the operational side of leading a school. But the principal workforce is large and there will always be a big variation in knowledge and skills. Being a principal has become more complex over time, with more responsibilities and workload. The system cannot rely on having superstar principals in every school being able to both expertly lead teaching and learning as well as be skilled operational leaders. The Review talked to principals leading high-performing schools with strong student outcomes where there are also positive School Staff Survey results. Despite their strengths and success, many of them were struggling to keep up with the workload. One of them had just gone on stress leave related to workload for managing the facilities. It is clear that capability building, though important, would not alone be sufficient to ensure administrative and compliance workload is sustainable for school staff.

Department requirements can be unclear to schools, leading to variance in implementation

The Review found considerable issues with clarifying requirements for schools, partially driven by differences between the regions, Senior Education Improvement Leader (SEILs) and department teams that interact with schools. Sometimes different regional policies are intentional, if a region believes that it needs to take a different contextual approach to a solving a problem or implementing a policy. An example of this is one region requiring extra documentation from schools regarding student suspensions, above the requirements outlined in department policy.

Other times these differences are unintentional and may be a result of reliance on outdated knowledge or unclear or vague policy requirements. There were many times that the Review team heard about an onerous task that school staff were completing that the department said was not required. In checking the policies, the Review team found that there were not many clear exemplars of what is, and what is *not*, required of schools. The PAL has made a significant positive difference in clarifying policies, but there are still some areas of the department that do not put policies on PAL or have different forms of policies in multiple locations.

A lot of policies are written at a high-level, open to interpretation by schools. School staff usually prefer to have much more explicit advice. Verbal advice from the department to school staff on how to interpret policies, for example from helpdesks, can vary significantly.

Finding 5: The school-based decision model is strained

Victoria has, for several decades, operated a model of school-based decisions where principals have larger control over their school's operation, including budget and staff. This model has been a foundational element of the Victorian government school system since the 1990s. At present, the model of supported autonomy remains central to Victorian education policy. Principals are given resources and broad guidance on their responsibilities but are expected to determine how best to meet them with some rules, support and guidance provided by the department.

The school-based decision-making approach increases administrative burdens on school staff. More than a decade ago, the 2013 Victorian Competition and Efficiency Commission inquiry into school autonomy found that principals often face high administrative loads, limiting the time they can dedicate to strategic leadership and improvement efforts. The amount of workload and responsibility has grown since that review. This is particularly

true in the context of substantial increases in investment in schools over the last decade. While schools continue to be the default unit of responsibility when new programs or priorities emerge, school staff will invariably carry a significant part of the workload of implementation.

As discussed above, there is a large variance between schools in how they set up operational systems. One way to reduce the need for principals to be highly skilled in school operations is to make fewer things dependent on the decisions of individuals. System-wide approaches that are common across all schools would mean that principal decisions would not be so impactful on school staff administrative workload. This would mean re-assessing the school-based decision-making model to create more consistency across the system.

Principals are willing to trade operational decision-making for less workload

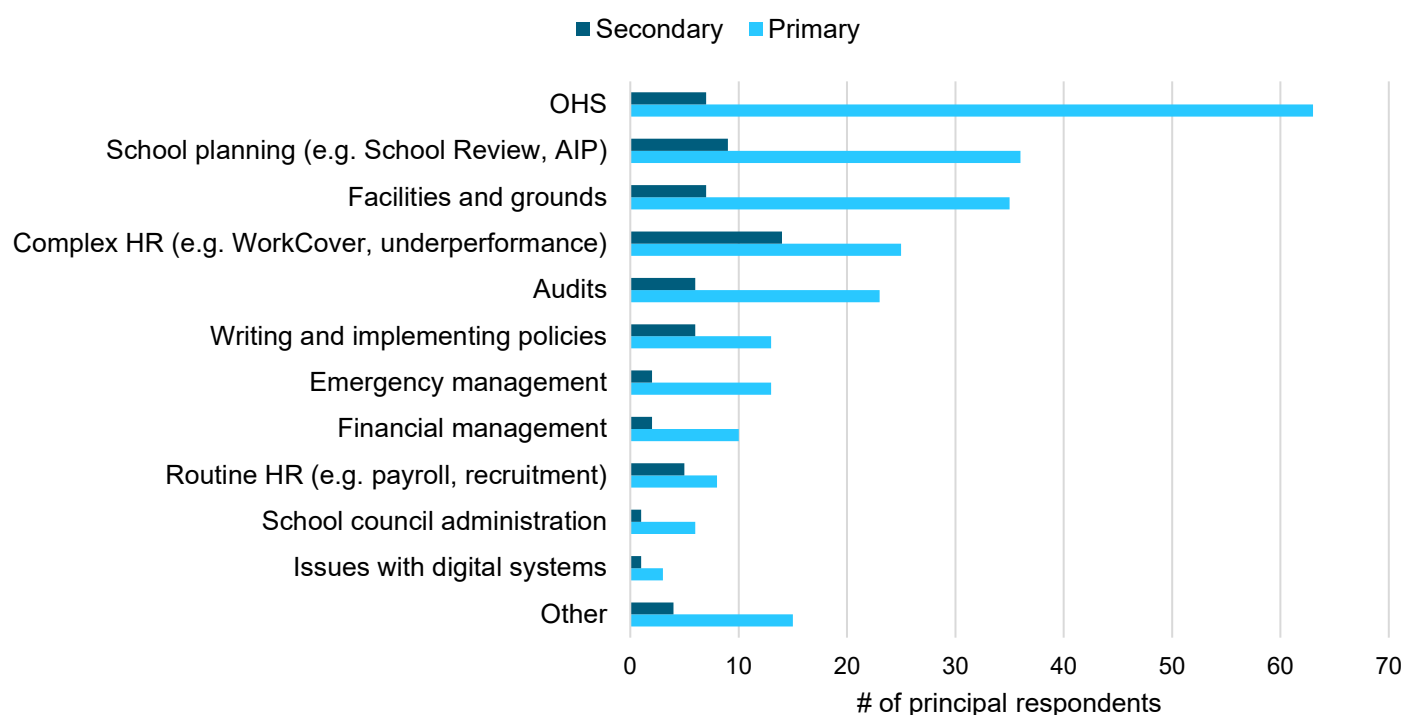
As reported to this Review, there is a sense from principals that given the increasing levels of administrative and compliance activities required, the balance has shifted and the benefits of the current approach to local decision making no longer outweigh the costs.

Similar to CEOs, principals are expected to lead all aspects of a school's operation, not just teaching and learning. As per the principal role description, they are the representative of the employer; they are the face of the school to families and the community; they lead the school vision, strategy and culture; support staff and quality of teaching to support the achievement, learning and wellbeing of students; they are the main point of contact (or escalation) for staff, the department, students and parents and they are responsible for the operation of the schools - planning, budget, facilities.

The Review heard from many principals and assistant principals that they are spending the majority of their time on school operations including administrative and compliance work and would like to have more time to focus on leading teaching and learning in their schools. As trained teachers, principals are not likely to have specialist expertise in the compliance and administration tasks they are increasingly required to perform. They are open to changing the arrangement of school-based decision making for responsibilities that are not directly related to teaching and learning.

School leaders identified OHS, school planning, facilities and grounds, and complex HR as the top operational issues that they would like to see simplified or removed from their responsibilities (see Figure 6).

Figure 6: Which 2 areas of administration and compliance are your biggest frustrations? (Choose up to 2 areas)
By school type (principals)



Finding 6: The department has had success with service-oriented supports to reduce administrative and compliance workload

The department has already made inroads in reducing school administration and compliance workload, and there is great scope to build on this success. These are a few initiatives that are already working:

- **Supports and services:** Recently, the department has created some centrally or regionally-based service teams for school minimum standards reviews, OHS, and finance. The department has initiatives supporting small schools with finance and facilities. These service-oriented programs have been successful in significantly reducing school administrative workload, and they point toward a future structure where the department has more of a school service model to work on behalf of, or alongside, schools to help them meet their requirements.
- **No-wrong-door principal service:** The Principal Advisory Service created by the department is an example of an empathetic, responsive school service that principals say saves them significant time but also makes them feel generally more supported and respected because they get quick, transparent responses. The service is also a single point of entry where no-one says, 'you've called the wrong number go somewhere else'. This type of no-wrong-door service saves valuable time.
- **Standardising policies:** The PAL and School Policy Templates Portal have provided some standard and template policies that all schools can easily find and use. Policies on the PAL are immediately applicable to every government school (without localisation) but schools still have to implement each policy. For local template policies on the School Policy Templates Portal, schools do need to localise these for their setting (some with little variation and others with more) and they also have to implement these, but the standardisation has taken a large workload off schools. School staff do not want to make up their own policies, and the department recognised this and created a user-friendly resource. The department can build on this idea to standardise much more for schools.

The department has had various initiatives to reduce the administration and compliance workload of school staff over the past few years. In 2018, the department set up the School Delivery Unit to coordinate, prioritise and streamline communication to school staff, which positively resulted in staff getting fewer emails and fewer administrative requests from various department teams. In 2019, this function moved into the Operational Policy, School Engagement and Compliance (OPSEC) division, which now acts as the key internal mechanism for

monitoring and managing school administration and compliance work requests across both policy requirements and school communications.

In recognition of increased administration and compliance workload, in 2019 the department established an audit coordination function (which seeks to ensure multiple large-scale audits do not happen in the same school at the same time) and creation of the School Impact Assessment. With the onset of the COVID-19 pandemic in 2020, the department took further steps to suspend or cease a number of requirements, including PDPs, and to expand other supports for school staff, in recognition of the changed environment and temporary shift to remote and flexible learning.

In 2018, the Victorian Government funded a Principal Health and Wellbeing Strategy which delivered the School Policy Templates Portal as a dedicated workload reduction measure. It was followed in 2020 with the launch of the PAL which was identified during the development of the local template policies as another workload reduction measure for school staff to have a single source for all department-wide policies, guidance and resources on all operational topics that applied in all schools.

In 2020 and 2021, the department also examined ways to improve consistency and support for school staff in meeting the minimum standards for school registration compliance requirements. As a result, this function was moved to OPSEC and re-designed to deliver a new supportive model, alongside principals, which has delivered hands-on expert support for all schools undergoing their minimum standards review.

See Appendix E: Legal, regulatory, and policy context for administration and compliance for further examples of department efforts to reduce administration and compliance workload.

There are many workload supports but not as much workload reduction

The VAGO Audit into Principal Health and Wellbeing¹¹ noted that while the department has done a lot of work with positive impact, there is still more that should be done to reduce the administrative and compliance workload for school principals. One finding from this Review is that there is a large difference between workload ‘supports’ and workload ‘reduction’ efforts.

The department has a number of teams that provide support and guidance to principals to assist them in their work. These supports range from meeting immediate information needs (such as calling the Principal Advisory Service for help locating a policy or advice to interpret a policy) to much more involved support (such as the Complex Matters Support Team¹² and VSBA’s Technical Leadership Coaches). Principals’ experience of department supports varies, but the Review consistently heard that principals want the department to do more of the work for them – not just send a link or explain the parameters. This is particularly true where principals consider that the administrative or compliance task is beyond their expertise as educational leaders or lacks the potential for strategic influence over outcomes in their school.

The Review found that there are helpful supports available to schools, but supports can be variable in terms of timeliness, quality, and nature of the advice (for example helping school staff interpret a policy versus just sending a link to the policy or templates). There is an opportunity to streamline services and expand their remits, as discussed throughout the recommendations in this report.

Supports are important, but they generally do not remove the work that school staff need to do. School staff would like to see both improved supports as well as more efforts to reduce workload. School staff are particularly interested in initiatives that provide services that work in a hands-on manner to reduce their workload, as well as building their capabilities.

The department has some new initiatives that were early stage at the time of this Review but are promising: the OHS Services Program and the Small Schools Program. Both of these initiatives are designed to provide schools with exactly the kind of workload reduction support they want to see more of. These programs should also ease the burden of 2 of the top issues for schools: OHS and asset management.

¹¹ Victorian Auditor-General’s Office (2023) [Principal Health and Wellbeing](#) Published by order of the Parliament of Victoria June 2023

¹² The Complex Matters Support Team helps principals respond to persistent issues that involve frequent and complex written correspondence with advocates, parents or carers. The team is multi-disciplinary and includes members with legal, social work, and teaching qualifications.

Finding 7: Small schools and specialist schools have a greater challenge with administrative and compliance workload

The Review found that small schools and specialist schools will need significantly more support to manage administrative and compliance workloads. The department already has a number of policies and programs designed to support small schools, which have had success. Some of these programs, such as the Small Schools Program described in this report, are new but promising. Specialist schools have had less targeted support to date with administrative and compliance issues.

Small schools

The Review found that small schools have a particularly high administrative and compliance workload. Schools that have just a few teachers tend to also have teaching principals with little time for administrative responsibilities. Small schools have similar administrative and compliance requirements to bigger schools but are too small to hire administration staff. There are a limited number of department programs to support staff at small schools, however existing supports such as the SASH and the Small Schools Program (OHS, Facilities and workers compensation), are received positively by schools.

When small schools can work together, formally or informally, and share administration staff, they can reduce workload as well. Models where multiple small schools formally become one school for administrative purposes but retain the same local campuses operating with some autonomy, have also worked well to significantly reduce administrative workload. The Review heard these shared arrangements work better when organised by the department in collaboration with schools, rather than the schools working independently. This is because school leaders can change, and the collaboration can fall apart. Setting up and coordinating a network of schools is also a significant administrative workload.

While there are a small number of schools - approximately 30 - with 2 teaching staff or fewer, the full responsibilities and accountabilities of a principal still applies. While the Review is not suggesting that it is the operating model for every school, one school principal told the Review that there were times when they were working as the only teacher in the school, teaching all day, doing all yard duties, preparing documents and being the principal. School leaders in overwhelming situations like this will be frustrated with new administrative work, and over time some consider leaving the profession.

“There have been a number of reports on the unique challenges of small school principals and the associated workload. These principals are working excessive hours because they are teaching and leading the management of the school.” – Small school principal

Specialist schools

Specialist schools have unique administrative and compliance challenges because of significant documentation for student needs, high staffing ratios, special facilities, urgent and complex issues that regularly require significant paperwork, unique needs for transportation of students and an administrative-intensive enrolment process.

Specialist school staff also have to do the work to customise most of the local policy templates to meet their specific circumstances. Most department resources are not created for specialist schools, and staff report a lot of administrative work in adapting approaches.

The Review found that specialist schools have a large administrative and compliance challenge and require support that is tailored to this unique school type.

Recommendations for the department by topic

Reallocate operational responsibilities away from individual schools

Recommendations

- 1. Reallocate operational responsibilities away from individual schools:** Recognising that principals' primary expertise is teaching and learning, the department should reallocate responsibilities that can be more efficiently and effectively delivered and overseen by regional or central staff. The department can undertake this work by considering the costs and benefits of centralising various functions.
- 2. Track administration and compliance workload and set improvement targets:** Recognising the value of continuous improvement based on quantitative data, the department should implement standard customer service measures which are comparable across core central services provided to schools (human resources, information technology and facilities management) and set annual improvement targets overseen by the department's senior executive.
- 3. Establish a team with authority:** Designate a team in the department to set targets for administrative and compliance workload reduction and monitor the administrative impact of new programs and policies.
- 7. Expand central and cluster models for small schools:** Given the diseconomies of scale in the operation of small schools, introduce/expand centralised and/or cluster-level structures which take on operational, compliance and governance responsibilities, and free small school principals to focus on daily school management.

Today Victorian government schools are in a situation where the burden on school staff is significant and outweighs the benefits of schools having so much autonomy in operation.

This can create a tension between local decision-making and system-wide standards, both of which can have benefits depending on the issue and context. More significantly, there does not appear to be a uniform or overarching framework guiding where different types of responsibilities are assigned (e.g. to schools or regional offices), the degree to which there is flexibility in any selected approach, what different approaches to school responsibility mean for the role of the department in supporting school staff and discharging its own responsibilities, and the mechanism by which responsibilities are reviewed or changed.

Many of the Review's recommendations and suggested actions are to remove responsibilities from schools. In the subsequent sections, these recommendations are described in more detail, but include:

- reducing asset management from school responsibility
- centralising administration of complex cases to remove them from school responsibility
- progressing the Insight pilot and centralising Year 7 transition responsibilities
- removing the requirement for a CLO to have school experience
- removing tracking of mandatory module completion from school responsibility and automate reminders about training requirements to staff
- offer a centralised recruitment option for schools to opt into if it suits their needs, in particular for harder-to-staff schools.

The report also covers the potential benefits of cluster-level governance, more department services to schools, and to automate operational activities that schools are responsible for, such as:

- investing in teams to provide additional practical, hands-on support for the pre-review self-evaluation and audits, based on the successful School Compliance Unit model for supporting schools to complete minimum standards compliance assessments

- resourcing the expansion of the Small Schools Program to support small and medium sized schools which do not have the resources to staff for asset management, workers compensation and OHS responsibilities
- developing a system to automatically send contracts out for new hires to significantly reduce or remove this workload from school staff
- elevating small school operational and governance responsibilities to centralised and cluster-level structures
- opening up the SASH to larger schools that would like to outsource financial tasks.

In reallocating operational responsibilities, it is important that the Victorian government school system is:

- cognisant of the benefits and drawbacks of placing greater responsibility on school staff
- aware that there are more choices available than ‘the school does it’ or ‘the department does it’
- logical in the factors it considers when deciding where responsibility rests
- clear in communicating choices made based on these factors.

The Review itself avoids simply defaulting to ‘the department does more’ or ‘the department does it all’ in response to the increased administrative and compliance load on school staff. Instead, a more sophisticated approach to determining responsibility, and supporting those responsible, is needed considering the specific circumstances of each responsibility, in the context of a cohesive overarching framework and principles, the promotion of a staged approach and one that takes account of context. The Review seeks to promote such an approach.

Ultimately, the choices available to the department when determining responsibility exist on a spectrum, which helps the department to navigate which responsibilities school staff are best placed to manage – and which come with different types and levels of support and central involvement – and which responsibilities are better managed centrally. Table 1 below provides a rough illustration of this spectrum.

Table 1: Spectrum of responsibilities

Level of responsibility for school	Role and responsibility of schools	Role and responsibility of the department	Circumstances where each layer of responsibility is appropriate
Schools granted control	Schools have full accountability and decision-making authority for a function and are able to manage it independently within a minimum set of rules and requirements.	Schools are provided with information on minimum legal, regulatory and policy requirements via PAL.	When the principal or school staff are best placed to use their professional judgement on the appropriate course of action.
Light touch guidance on good practice	Schools have full accountability and decision-making authority for a function but are provided with light touch guidance on good practice that is optional to follow.	Schools are provided with simple case studies, FAQs, example frameworks on PAL, and helpdesks for enquiries.	
Customised or higher intensity advice or guidance	Schools have full accountability and decision-making authority for a function, published on PAL, but are also provided with more intense advice and guidance that they can access if they choose.	Schools are provided with resources like the Principal Advisory Service or legal support hotline in Victoria, or the collegiate principals in WA.	

Level of responsibility for school	Role and responsibility of schools	Role and responsibility of the department	Circumstances where each layer of responsibility is appropriate
Decision making parameters	Schools have accountability and decision-making authority for a function, but the department places moderate parameters or limits on the choices that can be made.	Schools are provided with a range of options ('a menu') such as the Mental Health Menu, published on PAL.	
Opt-in to centralisation	Schools have the choice to manage the function themselves, with parameters published on PAL, or they can opt-in for the department to manage the function centrally if they wish.	Schools can choose to use software that has been centrally procured by the department.	
Centralise responsibility	Schools have no choice about how to manage the function and must comply with department mandates and process for it, published on PAL.	Schools must use the department's process for payroll and employee leave entitlements.	When there are economies of scale in delivery of a standard service; or when there is a limited pool of people with necessary expertise, making it difficult for schools to make informed decisions.

When making choices along this (or a similar) spectrum, the Review found that the department could improve on its current practice by being very clear about the sets of factors that drive its decision-making about where responsibility ultimately rests for each function or task within the government school system. And, even under this model, the department may still serve as a point of escalation or assume control in situations where school staff fail to manage the function or request assistance.

Table 2 outlines the Review's identification of potential areas of administration and compliance activities that could be reallocated away from the responsibility of schools.

Table 2: Opportunities to invest in reallocating responsibilities away from schools

Reallocate via	Examples	
Assumption of responsibility by the department	<ul style="list-style-type: none"> asset management ESM issue rectification pre-employment screening tracking of mandatory training completions, and reminders for staff 	<ul style="list-style-type: none"> development of VET provider partnerships school bus coordination for mainstream schools direct department-parent communications
Provision of stronger supporting teams	<ul style="list-style-type: none"> complaint handling (in particular earlier intervention and de-escalation) complex or longer-term WorkCover, employee conduct, and performance case management complex or longer-term complaints management complex or longer-term student transport issues specialist school enrolments 	<ul style="list-style-type: none"> replicate supports provided for minimum standards and OHS assessments to cover other audit and compliance programs VCE subject approvals for new schools expand range of procurement panels enhance access to interpreting and translating services enhance access to urgent legal advice recruitment as a service (opt-in)

		<ul style="list-style-type: none"> provide centrally based return-to-work coordinators
Development of local clusters	<ul style="list-style-type: none"> development of Disability Inclusion plans provision of local allied health supports development of shared curriculum and assessment resources preparation of camps and excursion paperwork 	<ul style="list-style-type: none"> facilities management support including coordination of contractor attendance for urgent repairs, routine and planned maintenance

Administrative support staff in schools

Recommendations

18. Provide administrative support for teacher teams: Use the department's Workload Reduction Fund pilot of Operational Teaching Assistants to inform models for providing administrative support for all teachers, including the appropriate level of resourcing required to materially reduce workload (i.e. the number of ES staff that might be required per teaching team).

25. Implement an education support staff strategy: Develop a workforce strategy for ES staff that clearly articulates the types of support roles and how they contribute to better management of administration and compliance and employment pathways. **Develop administrative capabilities in schools:** Design professional learning programs to support business managers and administrative ES staff to best perform the core school operation functions across finance, information technology, occupational health and safety and teacher support.

The Review recognises the critical role that ES staff play in the effective running of schools, but there was substantial variability in how schools integrated them in their daily business. The Review found that if the department acts to address shortfalls in the development and management of the ES staff workforce, then that workforce has the potential to play a significant role in reducing and better managing the rising trend of administrative and compliance work in schools.

Overview of the education support workforce

Victoria's more than 28,000 ES staff play a vital role in schools. The ES staff classification is broad and covers a wide range of non-teaching roles across 4 areas:

- **administration and operations** – such as business managers, HR, finance, or facilities roles
- **technical support** – specialist roles such as library, laboratory, food technology, or IT
- **student health and wellbeing** – such as psychologists, speech therapists, or social workers
- **student or teacher support** – usually called teacher aides or integration aides, these staff generally work in classrooms supporting students with additional needs.

Some ES staff perform roles which cross these categories or take on multiple roles within a category. All role types play an important role in administration and compliance activities to some degree, though their involvement varies.

The department does not have central oversight of the deployment of the ES staff workforce and leaves the roles and responsibility of ES staff largely to the discretion of the schools. This Review is challenging that decentralised model, finding that leaving decision-making to individual schools is problematic because the potential of this significant workforce to streamline school operations is potentially not being realised.

The school-based decision model means there is no comprehensive strategy or plan for the development and deployment of the ES staff workforce, and no group in the department is actively accountable for the

development of the ES staff workforce, or for particular ES staff role types (such as business managers). More detailed analysis of the ES staff workforce is at Appendix C: Supplementary evidence.

The table below gives an overview of themes from consultations with each cohort of ES staff. The following pages also provide a deeper view of 2 particularly relevant cohorts for this Review: business managers and administrative staff, and classroom-based student support staff.

Table 3: Overview of themes of findings for ES staff

Role type	What the Review found
All types	<ul style="list-style-type: none"> • can feel unappreciated and unsupported in their roles • receive inconsistent or inadequate induction and training • have limited opportunities for career growth or professional development
Administration and operations	<p>All administration/operations staff:</p> <ul style="list-style-type: none"> • feel that administration is their job, not a ‘burden’, but are frustrated by inefficiencies • are not adequately and systematically connected to ‘their’ part of the department (or don’t clearly have one) <p>For business managers in particular:</p> <ul style="list-style-type: none"> • concerned about a lack of succession planning • concerned that some principals are downgrading and de-skilling the role as a savings measure • would like to see investment in the status of the role (e.g. leadership development) • would like dedicated contact points and relationship management from the department (as for principals)
Technical support	<ul style="list-style-type: none"> • varies by role, but most reported manageable administration workloads, though under some pressure from part-time hours and rising requirements • some in laboratory technician roles reported being able to save science teachers significant administrative effort (e.g. in risk management, chemicals ordering and storage, experiment planning and set-up) • some in library roles reported greater issues, with many in part-time roles and needing to develop library processes unsupported
Student health and wellbeing	<ul style="list-style-type: none"> • would like more support for administrative duties, to enable them to focus on direct student support, but identified some limits to what is possible (e.g. can’t have someone else write their case notes) • some report issues of role clarity and friction with teaching and/or administrative staff over accountability for administrative requirements
Student or teacher support ¹³	<ul style="list-style-type: none"> • administrative workload seen as relatively modest, but work structure and time fraction mean staff have no time to complete these tasks • other barriers include sense of purpose and role clarity (especially for those funded to support a specific student), level of interest in this type of work, capability and access to training and development opportunities, access to laptops, and support to work from home • those heavily involved in development of DIPs and IEPs feel much higher administrative workload pressures and are more likely to take work home

¹³ Note that almost all staff in this category that the Review spoke to were primarily involved in supporting students rather than teachers, and teacher support roles appear to be uncommon.

The role of business managers and administrative ES staff

To support the requirements of the devolved model of decision-making and governance, nearly all schools employ a business manager (full or part-time) to lead the administration of the school. The scope of the business manager role is not fully defined, and while financial management is the most common element, even that is not universal. Business managers are increasingly taking on expanded responsibilities, in particular in areas which are also pressure points for other school staff such as asset management and OHS.

Many schools also employ administrative ES staff to take on different parts of the business management of the school. Smaller schools may employ a part-time business manager (who may also work at other schools) or utilise department supports such the SASH.

As noted above, there is no common development approach, qualification requirement, induction or training for business managers and other administrative ES staff. Some business managers and administrative ES staff told the Review that when engaging with the department they struggle to find clear answers to their questions, in particular for areas of their role beyond financial management (which is comparatively well-documented and supported, [see Finance](#)). Most ES staff agreed that PAL has improved their access to policy guidance and information, but many also observed that its sheer size and poor search functionality mean that finding an answer is time-consuming.

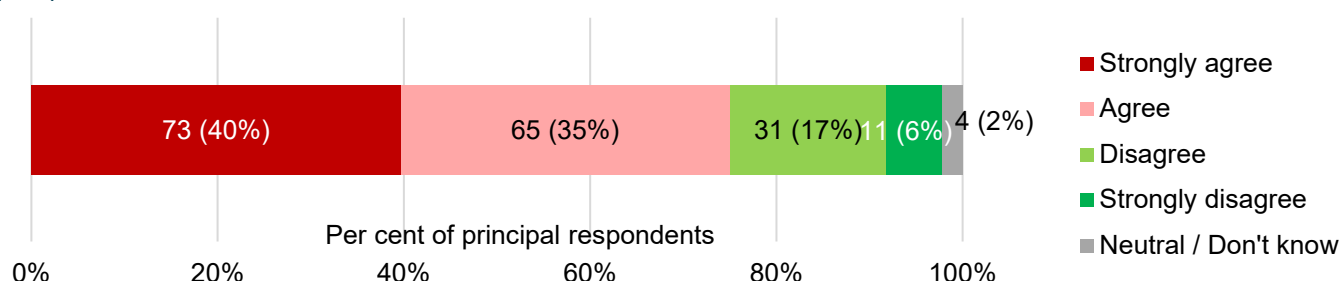
Principals are reluctant to hire administration support staff

The Review found that principals would like to hire more administration support staff, but most are reluctant to do so. About 75% of principals participating in the Review survey say that they would be uncomfortable spending more on administration staff (see Figure 7). This is despite the fact that many schools do have the budget to hire such staff and doing so would reduce the burden on the principal.

Administration support staff not only reduce the workload of principals but also play an important role in reducing teacher administrative workload. Principals who say they have made the choice to hire administration staff, such as executive assistants, say it has resulted in significant, positive change in the school to reduce staff stress.

The department should take a more interventionist approach including doing more to either encourage or require principals to properly invest in administration staff. Principals without sufficient budget flexibility to increase administration staff may require additional support from the department to adjust their operating model. Many principals indicated to the Review that they would like more advice on effective administrative structures and role types for schools of their size and type. These should build on the model developed in the department's Workforce Planning Initiative for increasing staff in leadership positions and be based on real school structures and position designs.

Figure 7: I would feel personally uncomfortable spending more of our school budget on administrative staff (for principals)



"I would like to see more principals taking action by using their current budget to hire administration staff to complete any current administrative and compliance requirements. Many principals need to be empowered to employ others to complete this work and not feel as if they need to do it themselves to save money. Permission to hire ES staff to do this work is important." – Principal

“Administrative tasks are part of any organisation. The problem is not the amount of administration but that there is not enough staff to complete all the tasks. The teacher shortage...has meant more SRP is being spent on attracting teachers, so less is being spent on administration staff, which means we (business managers and office staff) now have larger workload of administrative work, with less staff.” - Business manager

Executive assistants for principals

The Review’s analysis of principal email volumes suggests that there is a good case for many principals to employ assistants. Email metadata collected by the department indicates that principal class employees received an average of 300 emails per week, from a range of sources, during 2024. If each email took 90 seconds to read and action (a very optimistic estimate given that many emails will require an action) then the average principal would be occupied for a full 8 hours per week just on emails. At 8 minutes per email, this estimate would rise to 40 hours per week.

Despite this, very few principals the Review spoke to employ an assistant, despite handling a high volume of emails and phone calls, managing a complex schedule, and needing to keep track of a wide variety of tasks – all tasks where an assistant could provide significant workload relief. Some principals told the Review that they would like to employ an assistant but felt that they could not justify this to themselves, their staff, or their school community.

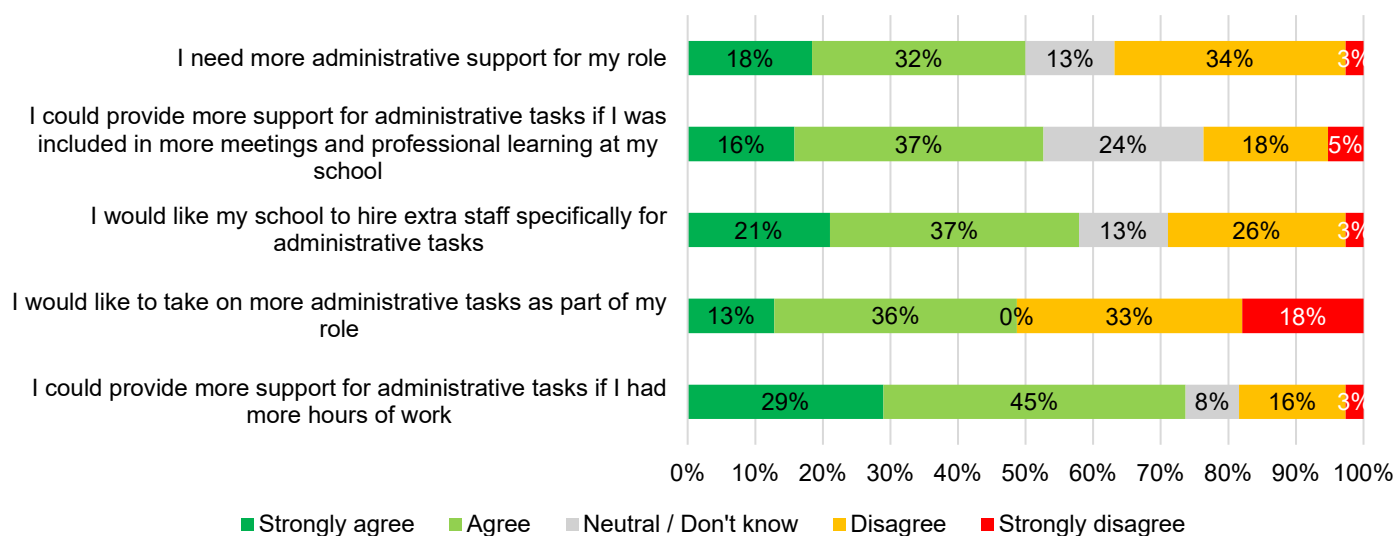
Administrative assistants for teachers

While current ES staff employment arrangements allow for such roles, the Review did not find evidence of any significant use of ‘teaching assistant’ roles in schools (that is, non-teacher qualified staff dedicated to supporting one or more teachers with administration, compliance, research and related tasks). This is an opportunity for government and individual schools, both to upskill and widen the scope of current roles, and to introduce new ones: camps and excursions coordinators, parent liaison roles, and general assistants supporting year level or learning areas leaders. These and other specific ideas for teacher support roles are discussed further elsewhere in the report.

Many classroom-based ES staff are willing take on administrative tasks if provided more hours

Classroom-based ES staff are willing to work more hours in a week to take on additional administrative tasks. While these staff often had relatively light administrative duties, it was also common for these staff to report having little or no time allocation during working hours to complete them. Many classroom-based staff observed that the teachers they work alongside struggled to cope with their administrative work, and some expressed a willingness to take on more responsibility for administrative tasks if their school could provide paid time for this work.

Figure 8: Thinking about how your role could change in the future, how would you rate the following statements?



Implementation actions for consideration – ES staff

Develop a workforce strategy or plan for ES staff that clearly articulates the intended scope of each type of ES staff role, including how each can contribute to better management of administration and compliance. The plan should set out initiatives and policy changes to remove existing barriers, build capacity, and encourage better practice, including:

- building on the existing dimensions of work for ES staff and the more detailed teacher work requirements to clarify the roles, responsibilities, and administrative work allocations of different categories of ES staff
- creating signals for school principals (including financial, policy and advisory signals) to employ additional administration staff, including as executive assistants to principals
- providing clearer guidance on appropriate administration and compliance resourcing for schools of different sizes, types and circumstances
- setting a target for an appropriate percentage of a school's SRP (and/or an appropriate proportion of FTE) to devote to administration
- working with the higher education and VET sector to create stronger training pathways for ES roles
- encouraging school principals to adopt employment models for classroom-based ES staff that provide adequate paid time for administrative duties while supporting flexible work options such as part-time and work from home
- creating more opportunities for professional development, mentoring programs and/or professional networks for ES staff of different role types to facilitate enhanced knowledge sharing, skill development, and support across schools
- support and resource schools to provide access to administrative support for all teachers, with a team-level model of one ES staff per teacher team.

Build the capability of business managers and administrative ES staff by:

- piloting the introduction of Chief Operating Officers (or Directors of Operations) in medium to large schools or networks of schools
- developing a Business Manager and Administration Page, modelled on the Principals Page, to provide relevant updates, resources and easy to find information
- increase awareness that business managers can access the Principal Advisory Service and can call the service for the same supports as principal class staff. Therefore, recommend renaming the Principal Advisory Service to the Principal and Business Manager Advisory Service.

Information technology system

Recommendations

- 20. Provide a department-wide student information system:** Noting the potential administrative and compliance efficiencies from streamlined digital process, provide a department-wide student information system that is consistent for all schools and removes duplicative data entry for teachers.
- 21. Integrate functions:** Integrate incident reporting, student data entry, and student reporting into a consistent information system to reduce duplication.
- 22. Provide a student wellbeing system:** Provide school staff with a secure and integrated system for student health and wellbeing case note management, SSS referrals, and related reporting, to reduce double-handling of information across systems.
- 23. Improve helpdesk supports:** Undertake a review of human resource, information management and technology, and physical school infrastructure support systems with the objective of designing more timely, responsive, accurate, and service-oriented practice, including provision of no-wrong-door helpdesks.
- 24. Modernise systems:** Upgrade key information technology systems, in particular CASE21, to improve user-friendliness, reduce double-handling of information, and increase reliability and efficiency.

The Review heard that schools operate in a complex IT environment. The department provides schools with a suite of centralised IT infrastructure and systems, and mandates certain key ‘systems of record’ – such as CASE21, eduSafe Plus, and AIMS – for management of the most critical information. Schools also purchase and use additional third-party systems to supplement the capabilities of the central offering.¹⁴ The department estimates that schools use over 180 information systems and tools, though given distributed procurement arrangements, the total figure is likely to be higher. Not all systems are in use in all schools, nor are they used by all staff. Certain types of staff (such as business managers in small schools, and those responsible for student wellbeing or careers and pathways) may need to use a particularly wide range of systems, including some controlled by other government agencies.

School staff are required by legislation and department policy to create, store, and manage records relating to a wide range of areas. This includes student records (such as those relating to assessment, attendance, health, or behaviour) and organisational records (such as those relating to finance, facilities, or school council).

Schools are not required by policy to adopt third-party systems but do so in practice primarily because they offer enhanced functionality and more user-friendly interfaces than department systems (such as CASE21). Features such as enhanced parent communication, digital assessment and reporting tools, data dashboards, behaviour and wellbeing monitoring, management of canteens or sickbays, and access to and integration with other third-party systems (such as those for timetabling or learning management) offer significant value by supporting daily school operations beyond what department-mandated platforms provide.

The Review found that the information systems and technology environment in schools is a common complaint of staff. In particular, the absence of a contemporary school management system shared by all schools results in the double-entry of much essential information in both department and third-party systems and was reported to the Review as one of the top drivers of unnecessary administrative and compliance activity.

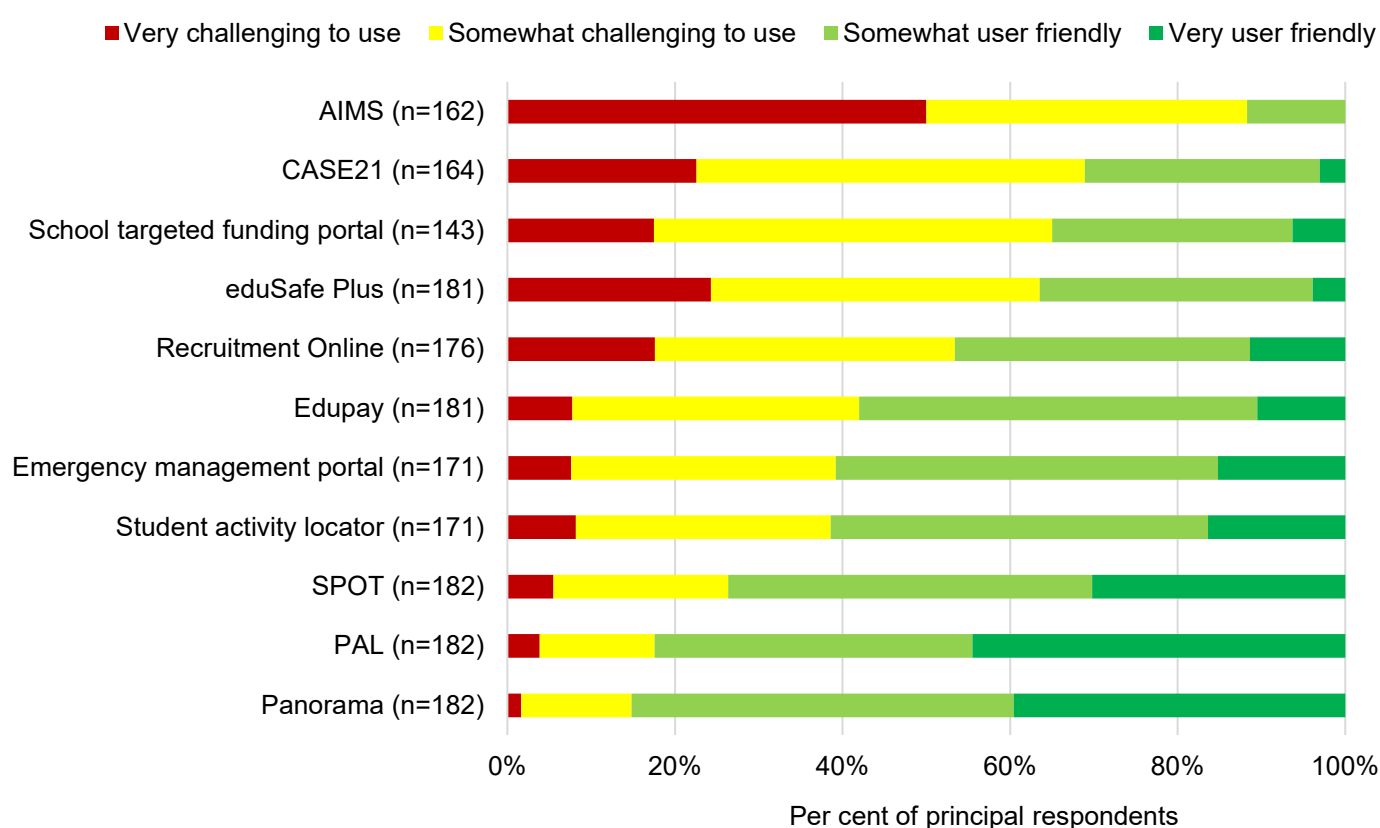
Departmental leaders told the Review that they share many of the concerns of school staff. Outdated and fragmented systems are expensive to maintain and may be more vulnerable to data breaches. Increasing reliance on third-party systems exposes the system to risks that the department cannot adequately control. The proliferation of systems procured by different areas of the department is less efficient and makes it harder to plan for the future.

¹⁴ Third-party student management systems (such as Compass, Sentral and Xuno) have become a major feature of school operations over the last decade and are discussed in the next section.

While some problematic systems are old and may be approaching the end of their useful life (for example, CASE21 was first rolled out in 2000), the Review heard that some more recent systems also cause issues for school staff. Delivering major government IT projects to a consistently high standard is an ongoing challenge that is not confined to the department or the state of Victoria. The Review heard that the corporate memory of IBAC's Operation Dunham and its findings in relation to the former 'Ultraneet' project have created an understandable caution in relation to these investments. However, the current situation will not improve without dedicated attention and investment.

Not all systems are seen as equally problematic by school staff. There are high levels of support for the user-friendliness of PAL, SPOT and Panorama amongst principals. The Review also heard that systems do not need to be brand new or technically sophisticated to be considered user-friendly. For example, principals held more positive than negative views about eduPay (which is over 15 years old) and PAL (which is a relatively straightforward digital library of policies and resources).

Figure 9: How user-friendly are the following digital systems? (principals)



The Review also heard about positive steps taken by the department in recent years. School staff greatly value the support provided by visiting IT specialists, who not only perform many specialist activities for school staff but remove the mental burden of these activities for local (usually non-expert) staff. School staff also appreciate that the department no longer requires each school to apply system updates locally, an example of successful centralisation. The Review also wishes to acknowledge positive system-level efforts by the department, including the development of a long-term vision for IT in schools, and increasingly collaborating with school staff to design new systems.

Third-party systems

Almost every school the Review engaged with used a third-party school management system extensively as its primary method for managing school and student information day-to-day. While Compass was the most common system encountered by the Review, some schools use other providers including GradeXpert, Sentral, uEducateUs and Xuno. Most systems have established some level of integration or data exchange with CASE21, but this is typically limited in terms of:

- **scale** – only covering one type of information, such as attendance data
- **timing** – only transferring information once per day rather than updating live
- **direction** – only transferring information into CASE21, not out of it to third-party systems.

Third-party systems have become so ubiquitous that it is difficult to imagine schools operating without them in 2024 or beyond. Families, students and staff have all come to expect the functionality that these systems offer and would likely not wish to return to manual or paper-based processes. School staff often spoke about the features and functions of these systems as if they were provided (or even mandated) by the department, while the department in practice has limited influence over their form or usage.

Despite the wide adoption of third-party systems, school staff are required to continue to record a wide range of information in the 17 department-mandated systems of record. In practice this often means manually re-entering some or all information in 2 or more systems.

School staff must also conduct school-by-school procurement processes and negotiations with suppliers to obtain and continue to use these systems, imposing an unnecessary workload burden that could be relieved through a centralised process. While not in scope, the Review also notes that the proliferation of third-party school management systems exposes school staff and the department to privacy and data security risks, probity risks, supplier disruption or failure risks, and potentially higher costs than could be achieved from purchasing at scale.

By continuing to rely on disparate third-party systems, the department is unable to realise the benefits of access to the ‘back end’ of shared systems, which could enable it to perform a range of analytical, monitoring and oversight functions without making data requests directly to schools. It is also unable to streamline currently manual school-to-school information handling (such as for transition from primary to secondary school).

While it is important to guard against the use of ‘back end’ data access in ways that add to workload, there are significant workload reduction opportunities from common systems. The department’s finance and internal audit functions are able to conduct monitoring of school budgets and financial transactions without seeking information directly from school staff (the AIMS asset management system has similar capability so as to not require additional compliance reporting). Central access (with appropriate safeguards) to key school documents like student reports and IEPs, as well as metadata such as time to complete a document or number of families opening reports, could enable the department to ‘right-size’ documents across schools. Increased access to administration data can also relieve the requirement for data collection via censuses, surveys and evaluations.

On balance, the Review considers that further investment in improving interoperability between third-party systems and the oldest department systems (such as CASE21) is unlikely to represent good value for money. However, improvements in interoperability with newer systems (such as AIMS or eduSafe Plus) is worthy of further investigation.

The Review also heard a range of views on the best method to deliver a common school management system experience. The Review considers that the goal of a shared school management system experience is of much greater importance than the method for achieving it and therefore does not recommend a preferred approach.

Some strategies worthy of deeper consideration include:

- developing a common system for use by all school staff
- procuring an existing system and delivering it to all schools, while working with the supplier to achieve policy compliance and develop features tailored to schools (noting that there are not currently ‘off the shelf’ systems available that could replace all of the functionality of CASE21 at the system level)
- designating a preferred supplier and working with that supplier to achieve seamless integration of all key administration systems, while allowing school staff to continue with other systems for a transition period
- developing a set of required standards for functionality, user interface, data structure, and interoperability and require all providers operating in schools to adopt these standards.

Implementation actions for consideration– Information Technology Systems

- Develop a strategy for replacement of digital systems that are reaching the end of their useful life, prioritising CASE21, VASS, SOCS and ROL.
- Redesign more recently established existing systems to reduce administrative burden and improve user experience, prioritising AIMS, eduSafe Plus, SPOT, and the Disability Inclusion portal.
- Deliver a common school management system experience for school staff, prioritising the standardisation of systems to support high administration tasks such as monitoring of attendance and behaviour, and student assessment and reporting.
- Digitise processes with significant paper-based or manual components, prioritising individual student planning, including for Disability Inclusion; excursions and camps; enrolment (including Year 7 transition); preparation of risk assessments and risk registers; HR record keeping; generation and distribution of contracts of employment; school council elections; local maintenance requests; and facility-specific safety and management (e.g. laboratory, library, kitchen, etc).
- Enhance integration and interoperability between key systems (in particular between AIMS, eduSafe Plus, and CASE21) with the central objective that no school staff member should have to enter the same information into an information system more than once.
- Introduce stronger internal policy and governance controls to prevent further development of disconnected systems and platforms by the department and individual schools.
- Gradually move schools toward a more limited choice of preferred third-party systems and invest in stronger interoperability across a more limited suite of tools (for example, through common data standards).
- Move to a single unique student identifier across all department and portfolio agency digital systems to simplify student data management, reduce manual cross-checking, and improve data accuracy.
- Ensure that all digital systems support appropriate delegated access for assistant principals, business managers and other staff so they can complete all required tasks and functions without using principal login details or requiring principal involvement in every decision.
- Develop and share with school staff a series of product roadmaps for major digital systems. Enable school staff to suggest improvements to include in future roadmaps and embed school staff to work with department staff on the redesigned functionality.
- Make reducing or better managing administrative work an explicit objective of all projects for new or upgraded school-facing systems and collect data that enables evaluation of success.
- Remove forced password change requirements in line with evidence on risk.

Camp and excursion paperwork

Recommendations

- 16. Remove travel application for excursions:** To minimise administrative disincentives to school excursions, simplify or remove additional travel application requirements for interstate travel, and - streamline approaches for applying for international travel.
- 17. Simplify excursion paperwork:** Restructure risk-management procedures by providing pre-filled excursion templates and risk assessments and significantly shortening compliance documents to reduce teacher burden.

There is significant administrative and compliance workload associated with camps and excursions, and the Review found that school staff consistently highlighted it as one of the 'hot spots' for attention.

Camps and excursions play a vital role in the holistic development of students and their experience of schooling. Compared to other school activities, there are inherently different and often greater risks with camps and excursions that must be mitigated for the safety of students and staff. School staff are required to complete a

substantial amount of paperwork, gain approval from their principal, and in some instances the department, consent from parents, and enter excursion details into the Student Activity Locator (SAL) at least 5 business days prior to the excursion date. SAL is an online tool that tracks where students are in case of an emergency. School staff are required to use it for all external school activities or for events outside of school hours.

In general, school staff understand the need for risk management for excursions. But the Review found wide concern that the administration for excursions is too time-consuming, and that school staff are reducing the number of excursions offered to students due of the complexity of the process and a one size fits all approach to risk setting.

The department has already taken a positive step in allowing reduced documentation for repeat, close-by 'local' excursions. In these cases, school staff are only required to seek parent permission once for the school. This reduces administrative workload for parent permission, but the rest of the excursion paperwork remains the same.

The Review found that:

- Staff were discouraged from organising school camps and excursions due to the onerous compliance activity required.
- There is significant concern that the administrative and compliance workload for camps, sports and excursion is not 'right sized'. There is little relationship between the size or type of activity and the workload involved in organising it.
- Staff report that some of the required information is repetitive. For example, school staff are required to create separate student behaviour management plans specifically for camps, sports, and excursions, which mirror the content of existing plans.
- Staff are unclear about the purpose of some of the required documentation. The Review heard that this lack of clarity can lead to school staff completing unnecessary documentation or exceeding the requirements for an activity.
- Some regions impose additional aspects of administration and compliance for camps and excursions, requiring school staff to complete additional paperwork beyond standard department requirements, particularly with interstate or international camps.
- Principals and business managers report experiencing delays in receiving departmental approvals for camps, and excursions. These delays often result in increased cost of the trips and stress for the teachers leading the program.
- There are multiple systems that school staff must navigate to organise a camp or excursion. Since these systems are not integrated, this results in duplicative data entry, creating an inefficient and time-consuming administrative process.
- Some schools struggle to meet the administration and compliance requirements. Smaller and specialist schools, in particular, have highlighted the complexity and stress associated with the paperwork and risk assessments for excursions and camps.

"The planning documents for excursions and camps are far too detailed and time-consuming and teachers find they are spending parts of their weekend completing them." - Teacher

Travel application process for interstate and international excursions

The Review found that school staff must complete an additional layer of compliance for excursions and camps that are interstate or overseas: the travel approval process.

The travel application process is based on the Victorian Public Service Travel Policy and aims at ensuring any public servant travel is worth public expenditure and keeps public trust. However, the lengthy process is problematic for school staff, and accompanying students on interstate excursions and camps is significantly different from traveling interstate or overseas as an individual. It is reasonable for policy to discourage

unnecessary staff travel to conferences and similar events, but it is problematic to discourage schools from offering students opportunities to travel on learning experiences.

This travel application process is in addition to the school-based excursion and camp approval documents which still must be completed and approved for interstate and international trips. School staff therefore have duplicate work because the excursion approval process is separate from the staff travel approval process.

Many school staff report that they are not given approval for travel by the department until days before the commencement of the trip. Even with advance application, and with the excursion and camp approval process finalised, if the travel approval comes too late it can impact whether the travel can go ahead as planned. School staff have to progress with purchasing traveling arrangements even though they do not have the outcome of the travel application, because otherwise they would be waiting too long, and costs would escalate.

Whilst international travel carries additional risks, the Review heard that these risks are not inherent to interstate travel. For example, a school in Mildura may prefer to plan an excursion to Adelaide rather than Melbourne because of proximity, and there are no unique risks to traveling across the South Australian border. Activity-specific risks, such as for overnight accommodation or adventure activities, have additional requirements outlined in the Excursion Policy which already apply to both in-state and inter-state excursions.

“The review process for regional approval of interstate camps is overly complicated and cumbersome. Each time I have completed the process I have had a different reviewer who has picked up different minor issues than the person the year before, none of which are listed as requirements when completing the documents. It means you go through a really long back and forth process and you can’t learn from previous years as you are at the whim of which reviewer you get in any given year. process should be evaluated because it is already hard enough to organise a camp and this process further discourages schools from participating.” - Principal

Student Activity Locator

The Review found a degree of dissatisfaction with the additional administrative work associated with completing the SAL. The SAL is an interactive database tool used by school staff to record excursions, camps and other activities occurring away from the school site or outside of school hours. In case of an emergency, the SAL provides emergency services and the department’s emergency management staff with essential information to support student and staff safety. The guidance included in the department’s Excursions Policy outlines that “all Victorian government schools must use the SAL to notify the department of any approved school excursion or camp, at least 5 business days beforehand.”

Although the SAL is relatively well designed and straightforward to use, the Review found it is an additional task required by school staff and can impact the choice a teacher may make to take students on a local excursion given it requires administrative work. The SAL is considered valuable by school staff for activities which take students to more remote or high-risk locations; however, some school staff question the value of effort required for local excursions and other low-risk activities, such as inter-school sport events.

Implementation actions for consideration– camp and excursion paperwork

- Remove the separate travel application requirement for interstate and international camps and excursions.
- Expand scope of local excursions paperwork reduction to cover other small outings and low-risk excursions and reduce risk assessment requirements for these low-risk excursions.
- ‘Right size’ the administrative and compliance activity depending on scale and risk of the camp and excursion activities and provide examples demonstrating to school staff the level of content required in common forms.
- Review the cost-benefit of requiring the Student Activity Locator be completed for all low-risk excursions.
- Give all school-based staff automatic access to the Student Activity Locator removing the need for access requests, wait time and approvals.

- Reduce camp and excursion risk assessment documentation to one page, highlighting the most critical risks and mitigations. Deliver a digital camps and excursions tool, including automated workflows and standard pre-filled risk templates.
- Reduce duplicative compliance requirements for camps and excursions. For example, allow school staff to use existing plans for individual students, such as an Individual Education or Behaviour Support Plans for camps and excursions, rather than creating new documents for this purpose, adding in alterations if required.
- Adapt the excursion policy for specialist schools, in recognition that students in these schools have detailed existing documentation that address risks to their safety and wellbeing, including day-to-day adjustments in a range of contexts and environments. Permit specialist schools to refer to existing plans and documentation and only prepare additional information on excursion-specific matters not covered elsewhere.

Compliance requirements for students with additional health, wellbeing and learning needs

Recommendations

- 9. Create dedicated expert resources to assist specialist schools with compliance:** Recognising that specialist settings are subject to compliance requirements greater than mainstream schools, invest in the specialist areas in the department that can support specialist schools with their administrative and compliance activities, including the customisation of standard departmental policies.
- 11. Consolidate student documentation into one plan:** Victoria should move to a One Plan model (similar to South Australia) to consolidate individual student learning, health, and wellbeing plans in a single purposeful, efficient and distinct document.
- 12. Remove ‘recommended’ Individual Education Plan guidance:** Where Individual Education Plans are not mandatory, make it clear to schools that they do not need to be completed. For mandatory plans, ensure that there is clear guidance on required detail or length (e.g. number of pages/words).

The Review found that schools with a high proportion of priority equity cohorts of students can face a considerably higher administrative and compliance workload compared to other schools. It is important to distinguish between the supports for students, which schools see as part of their core business, versus the *documentation* of those supports. This Review is focused not on the supports for students with additional needs, but on the documentation and compliance associated with those supports.

Schools have legal obligations under the *Equal Opportunity Act 2010* (Vic), the *Disability Discrimination Act 1992* (Cth) and the *Disability Standards for Education 2005* (Cth) to make reasonable adjustments to accommodate students with additional needs. These accommodations are not in the scope of this Review. However, the exact templates, documents, platforms, and processes that are required of schools to provide evidence that they are meeting obligations represent compliance activities and are in the scope of this Review.

Below is an example of how school staff are expected to document the additional supports they are providing to students. This quote from a teacher exemplifies the findings from the Review that schools may have no problem providing the supports that students need, but have significant concerns about the time it takes to document these supports or adjustments:

“The many adjustments that teachers and ES staff make on a daily basis to ensure the success of a child, are very nuanced, and personalised, however in authentic settings, are not always documented or recorded. Ensuring that there is a record of the substantial/extensive adjustments implemented for students to show as evidence during a profile review does create an additional administrative workload that can be challenging to keep on top of.” - Teacher

There are 3 categories of additional supports that may have increased administration and compliance: students with additional needs, health and wellbeing supports, and priority equity cohorts of students. Schools serve their

communities, and those communities encompass a diverse range of groups, some of which face particular challenges based on their backgrounds or life circumstances. These groups include Culturally and Linguistically Diverse students, Koorie students, students involved in the Youth Justice system, and those in OoHC. Like all young people, they have the right to a high-quality education and the department provides schools with frameworks, funding, and guidance to support the different needs of these students. Schools, in turn, are responsible for implementing these policies, ensuring compliance, creating inclusive environments, and monitoring each student's progress and wellbeing.

The department has a new approach to Disability Inclusion which is significantly changing the administration and compliance associated with students with additional needs in schools. The Review found the new Disability Inclusion approach has many benefits, and most schools are pleased that they now have access to more funding to support students. However, school leaders and teachers are managing a significant increase in the administrative workload to support students with additional needs and have found some processes frustrating and unclear in their purpose. There is concern that the time required for meetings and documentation under the new approach is not sustainable, particularly as a greater proportion of students are now eligible for funding.

The department requires schools to establish SSGs for students who need them. An SSG is a partnership between schools, parents, the student and relevant outside professionals and agencies. The group works together to plan and support the educational, health, social, cultural and emotional wellbeing of students with diverse learning needs. Schools must establish SSGs for students supported by the Program for Students with Disabilities or Disability Inclusion, those in OoHC, Aboriginal and/or Torres Strait Islander students, and students with diverse learning needs.

Managing SSGs is resource intensive. SSGs require significant coordination and disrupt teaching and planning time. Managing priority equity groups (particularly external members and parent/student advocates) is complex, time consuming, and cognitively demanding. In large schools, or schools with large numbers of student who require an SSG, it can be difficult to comply with requirements for the frequency, length and attendance of certain staff (particularly the principal or wellbeing/inclusion leaders).

The Review found the following regarding supporting priority equity cohorts of students:

- **A growing share of students:** Students with additional learning, health and wellbeing needs represent a growing proportion of students in each school. Teachers with less than 55% of students needing additional documentation and compliance meetings may be able to find enough non-teaching time to complete this work. But it is increasingly common for teachers to have upwards of 10% %of students with some additional need that requires documentation and compliance. Many schools now have upwards of 50% %of students with some form of additional need, whether that is wellbeing, learning, or health related. The administration and compliance concern is greater in schools with a greater share of students with additional needs.
- **The concern is documenting the supports, not the supports themselves:** School staff are devoted to making sure students get the support they need to thrive. Often, schools see the documentation requirements as separate from the supports. The supports are evidence-based programs or interventions that help students with additional needs. The documentation requirements provide evidence, often to external bodies, that the schools are implementing the right supports. School staff want to reduce and streamline the documentation requirements so that they can focus on implementing the supports.
- **Engaging with external agencies (both government and non-government) increases administrative workload:** This is particularly the case when school staff are accessing external supports like paediatricians, SSS or NDIS; for each of these there is paperwork, case meetings, and other administrative tasks that school staff must undertake. In some cases, school staff spend excessive time liaising with external agencies without sufficient guidance or support from the department on roles and responsibilities. School staff are seeing increasing demands placed on them to work alongside external agencies. School staff are asking the department to support them in placing clear boundaries on these requests and to find a way for external agencies to support children and their families while not unnecessarily adding to the already high administrative load on schools.
- **Mandatory IEPs for priority equity cohorts of students can create high levels of paperwork:** In addition, parents may be reluctant to engage and/or offended by the mandates if they perceive that their

child is doing well at school; however, additional support is available and priority equity cohorts are entitled to that support.

- **Recommended IEPs are done as compliance in many schools, and there is wide variation in practice.**
- **Disconnected and unreliable digital systems increase staff workload:** Staff need to use multiple systems to manage student health and wellbeing, including SOCS, EduSafe Plus and CASE21. These systems are not well integrated, have difficult or ageing interfaces, and are prone to crashes and outages, which add significant time burdens on school staff. School staff need a secure platform to capture, store and transfer case notes that follow the child. School staff are concerned about the security and accessibility of the case notes generated across multiple health and wellbeing initiatives, the fragmented access to different types of health information, and the difficulty of transferring information between staff and schools at key transition points.
- **Lengthy and repetitive administrative processes and delays accessing SSS staff and specialist supports:** The process of accessing SSS is bureaucratic, requiring significant documentation and long wait times. The workflows involved are not streamlined, and information requests can be repetitive, such as multiple forms and consent requirements. Staff shortages in SSS teams can contribute to these issues.
- **Duplicative and complex documentation requirements create unnecessary administrative burden:** Many schools are creating multiple support plans for intersectional students, for example creating an IEP and a Cultural Plan for a Koorie student in OoHC, with these plans outlining the same learning goals. The IEP is a department requirement, whereas a Cultural Plan may be requested by DFFH or community-based case workers during an SSG. School staff are both concerned and conflicted about the department requirement to have school developed medical plans (e.g. for asthma or diabetes) in cases where such plans have already been provided by an outside health professional. This is unnecessary duplication and could potentially increase risk, as most school staff are not qualified to develop or interpret such plans. Forms are frequently only available in English and therefore inappropriate for some families and time-consuming for school staff to have translated.

Quotes from school staff:

“We have students 180 students out of a total 438 enrolments on various mandated plans - IEPs, Gender plans, Health plans and OoHC plans, they are a significant burden and take up an excessive amount of time. I feel like people who are asking us to do this compliance work don’t understand how schools run.” - Principal

“Compulsory ENAs for students in OoHC is repeating a lot of work that has already been done, considering we are a special[ist] school setting.” - Assistant Principal

Implementation actions for consideration - compliance requirements for students with additional needs

Administration associated with working with external systems and supports

- Remove the requirement for school staff to apply for a CLO and instead offer CLOs to willing schools allocating based on Australian Bureau of Statistics or CASE21 data. Reallocate CLO-related accountability processes to regional staff.
- Pre-populate LOOKOUT digital data collection with known student details.
- Direct SSS and school staff to not begin an ENA for students in OoHC until SSS has capacity to begin the assessment. Begin the ENA process by collecting existing documents to reduce duplication of effort.
- Develop a light-touch mechanism for school staff to access the ‘queue’ for supports such as SSS.
- Provide more guidance and practical advice to schools on expectations and appropriate boundaries in working with third parties including issues of access and task allocation.

- Work with relevant agencies to develop a new multi-agency agreement and strategy focused on improving how staff collaborate across the education, health, care and justice systems. The strategy should commit to specific actions which balance workload concerns and improve clarity and collaboration between staff from different organisations, for example:
 - streamlining documentation and developing common forms and templates
 - cross-agency training for staff in understanding each other's operating context
 - establishing communication norms.

Disability and inclusion administration

- Ensure all resources to support the DIP process are available in one place on PAL.
- Conduct profile meetings on the assumption that all present have read and accepted the contents of all documentation.
- Amend the DIP review process to only focus on changes that have been made to a student's adjustments (increase or decrease) since their initial DIP was developed.
- Work to increase community sector agency understanding of DI reforms and the DIP criteria, reduce friction in interactions between schools and agencies, and combat potential misinformation about the initiative being shared to parents by external agency workers.
- Designate a team in the department to specifically support specialist schools with their unique administrative and compliance challenges.
- Allow sufficient flexibility in the requirement for IEPs and SSGs for students based on their background or circumstances, to allow for student and family input to reduce documentation requirements for students who do not require additional intervention.
- Investigate options to provide additional administrative staff to mainstream schools with high enrolments of students with additional needs, in particular to support other staff to manage the administrative burden of NDIS and external agency requests for support from or access to schools.
- Investigate options to streamline the DIP process in secondary schools with a particular focus on reducing the need for multiple subject specialist teachers to separately prepare similar documentation for every student.
- Investigate options to streamline the DIP process in specialist schools, particularly when students meet extensive criteria across multiple categories of need and were assessed as such in order to enrol at a specialist school.
- Drawing on efficient administrative practices in highly effective schools, provide more guidance to schools on how they should allocate funds and design roles to reduce the workload impacts of the DIP process, with specific advice for schools of different sizes, types and contexts.
- Design and pilot a cluster support model to support the administrative workload of the DIP across groups of small schools, for example by resourcing a shared inclusion leader and supporting team.
- Provide school staff with a secure and integrated system for student health and wellbeing case note management, SSS referrals, and related reporting, to reduce double-handling of information across systems.

Compliance training and mandatory modules

Recommendations

10. Reduce mandatory training modules and replace recurring training with annual assessment: To reduce time spent on low-impact compliance training, replace recurring compliance and training module requirements with a short annual assessment that helps teachers identify where there are gaps in their required knowledge, and remove requirements for schools to track mandatory module completion.

The Review found regular compliance training and mandatory modules for teachers are time-consuming and their efficacy is questionable. School staff must complete department-mandated induction training including OHS e-learn modules and other department requirements. Some mandated training is school led and coordinated e.g. first aid, CPR and anaphylaxis.

The Review found that school staff have reported feeling overwhelmed and time poor, often questioning the frequency and viability of completing mandatory LearnED training. Staff reported that they frequently lack time to complete all required training during work hours and are often forced to do so in their unpaid time.

The department's mandatory and priority training planner indicates that there are 14 mandatory training requirements for all teachers, with further mandatory modules required depending on the employee's role. In addition, there are non-mandatory but strongly recommended training requirements that school leaders may feel obliged to ask staff to complete. The mandated OHS modules were recently reviewed to make the learning design and approach more engaging. This work also saw the number of mandated OHS modules reduced from 5 to 3. This cut the total training time for these modules from approximately 4 hours to just one hour. This is a positive example of what department teams can do to reduce the compliance work of school staff. More Central Office teams could support schools in this way.

The Review found that school staff have concerns about the high volume of training requirements, noting they often cannot complete them within working hours. School staff told the Review that the content and design of modules is variable in quality and often not differentiated by role, experience or context. In particular, many perceive the mandated repeat modules as burdensome, ineffective, and not respectful of their time and capability (see Appendix B: Submissions and survey results).

New South Wales has taken a new approach to replace repeat mandatory with an annual assessment. Read more about the case study in Appendix D: Case Studies.

Occupational Health & Safety and Workers' Compensation

Recommendations to better support principals - People management

- 5. Centralise complex HR:** Where complex human resource and workers compensation matters (such as ongoing workers compensation, staff conduct and performance) are resource intensive or require specialist expertise, provide or expand central services that manage individual cases on the school's behalf.

Maintaining a safe workplace is the responsibility of management in every workplace. The Review found that some school staff are under-equipped for some aspects of school-level management of OHS and Workers Compensation cases which come with a heavy load of compliance and administrative activities.

Consultations revealed that the practical implementation of OHS policies often leads to significant administrative burdens, perceived misalignment of priorities, and unintended consequences that can undermine safety culture in schools.

The Review found that:

- OHS and WorkCover workload has grown significantly in recent years, largely reflecting increased obligations across all industries. This places additional pressure on school leadership in particular and increases the risk of burnout and errors.
- Some schools are outsourcing OHS compliance and hiring external consultants to manage OHS and WorkCover compliance, citing excessive workload and lack of expertise among school staff. Whilst some schools can fund this service, for other schools it is out of reach or places additional financial strain on the school.
- There is a perception among school staff consulted that the department's priority is its own compliance, not safety in schools. Having spoken with senior department leaders about safety matters, the Review does not share this assessment. However, the Review observes that this perception arises from a context where school staff experience safety-related administrative and compliance requirements much more frequently than they experience practical support to address local safety issues.

- Some school staff have received inaccurate or inconsistent advice from the department and as a result have contracted service providers to undertake significant work that is not required. This is described by staff as frustrating as it impacts their trust in department advice and has led to a waste of both time and school funds.
- OHS risk assessments and registers are burdensome. School staff frequently told the Review that the process of completing risk assessments is frustrating because it is very time-consuming, they lack appropriate content knowledge, and there is limited review or feedback on the risk assessments from the principal or the department leaving them uncertain if their efforts meet required standards. There is a sense that the risk assessment settings for some activities aren't 'right sized' with the activity.
- Extensive OHS documentation requirements that are required to be done to be compliant with legal obligations can deter reporting and create a culture of non-compliance.
- School staff need significantly more support to manage the impact of safety changes on school operations.

“WorkCover should be removed from schools and managed by the department centrally. It is time-consuming and complex.” - Principal

“Schools discourage reporting on eduSafe Plus, it’s too onerous. Teachers are too time poor.” - Teacher

“Specialist schools have a larger number of eduSafe Plus reports to manage, the platform is not conducive to workflow and ease of use.” - Principal

“The WorkCover officer in regions is helpful, but not enough for the number of cases and complexity.” - Business manager

Implementation actions for consideration – occupational health and safety and workers’ compensation

- Consolidate risk assessments and create additional standardised risk assessments for common activities to reduce time spent on this task. Provide additional on-the-ground support services to schools to complete risk assessments.
- Streamline, standardise and connect safety-related digital reporting systems (including eduSafe Plus, CASE21, and AIMS) to reduce double-entry of information, minimise administration time, and replace complex medical or technical terminology with simpler language.

HR and employee conduct

The Review found the complexity of HR policy and extensive delegation of responsibility to school staff is a major contributor to the administration and compliance workload.

All staff in the Victorian government teaching service are employed by the Secretary of the department under the Victorian Government Schools Agreement (VGSA) 2022, which defines employment conditions such as working hours, leave entitlements, and salary structures. Further standards and employment practices are underpinned by the *Public Administration Act 2004*, Ministerial Orders 1388 and 1006, and relevant Australian employment law.

The department is responsible for supporting the application of the collectively bargained employment conditions and employment law across the government school system. This includes development and application of human resources policies and guidelines, which are made available:

- through the HR section of the PAL for all school staff
- through phone and email helpdesk support for principals, business managers and HR administrators
- through certain specialist advisory functions (primarily for principals).

Victoria has delegated a significant part of HR responsibilities to principals, who act as the employer's representative in each school and are accountable for ensuring compliance with relevant laws and policies. Functions delegated to the principal include workforce planning (including determining the number and types of staff), recruitment and selection of staff, induction, professional development, promotion, performance management, employee conduct, and consultation with staff on local implementation of industrial frameworks and HR policies.

The Review found the extent of delegation of HR responsibilities to the principal is a major contributor to administrative and compliance work for principals, and for ES staff who support them with these tasks. The Review also found that principals place great value on these responsibilities (in particular, planning for and selecting staff) and view them as crucial levers to improve school performance and student outcomes and would not wish to see Victoria move to more centralised HR arrangements.

The Review found many school staff reported HR policy content on the department's website as dense, confusing, and inconsistent. The Review heard that most HR content was not written for a digital format, has not substantially changed in presentation for 15 to 20 years, and is not subject to the same review by OPSEC as other PAL content.

The Review also found school staff reported receiving inconsistent advice from the department on HR matters. Sometimes this advice appears to contradict written policy requirements, and on other occasions to contradict previous verbal advice (or advice given to other school staff). Department leaders told the Review that what can appear to school staff to be inconsistencies often reflects the complex and shifting context for HR policy (including Commonwealth and State requirements, court decisions, and bargaining outcomes), and stressed the importance of maintaining some flexibility where possible in managing complex cases.

The department has made significant progress toward reducing the backlog of HR tickets which arose from demand growth between 2020 and 2023, through revised processes, new team structures, enhanced training and extra resourcing. However, this investment is relatively new and school staff who spoke to the Review are yet to experience the full benefits or build trust that they will be sustained.

In this context, the Review found that business managers and HR administrators in schools have formed a range of unofficial networks and online forums to advise one another on the best way to resolve HR issues. Unofficial and unmonitored groups risk becoming echo chambers for inaccurate or out-of-date advice and acting on this advice can compound issues if left undetected.

The Review finds that there is unmet demand for a formal location for documented knowledge-sharing on HR matters, similar to the online support forums offered by a range of organisations. Having a place to ask questions and have the department provide a documented answer would curb the variability in departmental advice, provide more consistent information, offer training and quality assurance opportunities, reduce instances of many staff asking the same question, and reduce time spent searching documents or waiting in queues for phone support. The department could use insights from such a site to inform updates to policies and guidance materials on PAL, educate new HR help desk staff, and identify emerging issues.

HR records management

The Review found that school staff perceive the management of personnel files in hard copy to cause significant administrative work and inefficiencies. The Review heard of schools waiting for up to 3 years to receive hard copy files for new employees from their previous school, leaving the receiving school with incomplete information on the employment history of a new employee.

Time in lieu

The Review found that elements of the roll-out of the VGSA 2022 were administratively very challenging for school staff to implement, such as provisions to give teachers time off or additional payment in lieu of required work outside normal hours for school activities such as camps, sporting activities or parent teacher meetings. These new arrangements came into effect on short timeframes (confirmed July 2022 for commencement 1 January 2023), with the full suite of guidance materials and ready reckoners not made available by the

department until October 2022. Principals and business managers told the Review that this short timeframe left them uncertain and unable to adequately plan for the transition or communicate new arrangements to staff. Many of these school staff procured or developed local systems to manage time in lieu administration (such as new forms, mobile phone apps and ready reckoners), adding to administrative workload.

Managing performance and conduct issues

As part of the delegated role of principals, performance and conduct issues are largely managed at the school level. The department provides advice and support for principals and other managers to navigate legal and procedural issues, document actions, and support improvement where possible. Staff who do not meet standards at the most serious level may face action from the department, the Victorian Institute of Teaching (VIT) or other authorities, but this level of response is relatively rare.

The Review found that management of serious unsatisfactory performance and misconduct is rare, but challenging, stressful and time-consuming for school leaders when it does occur, in particular when deep involvement is required over long periods of time.

Many school leaders praised the quality of support they receive from the department on employee conduct matters but expressed a desire for that function to be better resourced in order to improve the timeliness and comprehensiveness of help, and address issues before they escalate further. The Review heard that school leaders want:

- a consistent case manager so they do not have to repeatedly explain the issue to different people
- more tailored and hands-on support, for example using information shared by the school leader to fill in templates and draft documents on their behalf (rather than providing blank versions for the school leader to complete)
- continuous learning and contact opportunities (for example, a monthly online drop-in session facilitated by Central Office staff)
- updated guidance and resources.

Several school leaders shared concerns with the Review that current teacher supply issues in some parts of Victoria have increased the risk of unsuitable hiring and may lead to an elevated need for performance and conduct management in future. In considering the case for further investment, government should consider this risk.

Recruitment and induction administration

The Review found that given ongoing workforce shortages, schools are facing increasing pressures to efficiently recruit and onboard staff while navigating complex policies and systems.

Effective recruitment and induction processes are critical for maintaining the quality of the teaching and ES staff workforce in schools. School recruitment occurs within the context of the VGSA – which is collectively bargained with employee unions periodically – and department HR policies, which help to ensure compliance with legal requirements and guiding principles in employment, equity, and fairness.

Schools manage their recruitment processes, with principals exercising delegated authority to select the best available employees. Recruitment must comply with Victorian public sector employment principles, the *Public Administration Act 2004*, the VGSA, and equal opportunity legislation, ensuring a fair and merit-based selection process.

The department provides the ROL platform to manage job vacancies, policies and guidelines to ensure recruitment processes are fair and transparent, a panel arrangement to manage the hiring of casual relief teachers (CRTs), and finance systems and processes to ensure recruitment decisions are financially sustainable.

Principals and school staff handle the end-to-end recruitment process, from advertising positions on ROL to conducting interviews and making hiring decisions. As part of this process, school staff conduct compliance checks on potential employees to ensure that they meet qualification, registration and visa requirements. The

local selection arrangement allows schools to tailor recruitment to meet specific educational needs, with a significant degree of discretion exercised in managing these processes.

School staff are responsible for verifying CRT registration with the VIT and ensuring compliance with employment obligations. This includes engaging CRTs through approved channels and managing their integration into the school environment.

The Review found that school staff face significant challenges in managing recruitment and induction, particularly given the current strain of workforce shortages and the ongoing complexities of administrative requirements. Some common findings include:

- ROL is cumbersome, difficult to navigate, and not user-friendly – especially given the volume of recruitment activity in schools.
- School staff are beginning to highlight strategies they are adopting to reduce teacher workload in ROL job advertisements, acknowledging that to maintain and attract teachers, schools need to adjust.
- The length and complexity of recruitment processes fails to match the urgency schools experience when needing to fill vacancies quickly, adding stress to the process.
- The KSC for teachers is quite extensive, leading many school staff to overlook it in favour of focusing primarily on cover letters and resumes during the shortlisting process.
- School staff engaging in international recruitment find themselves overwhelmed by the administrative requirements, lacking clear guidance or standardised processes to follow.
- The yearly contract renewal process is time-consuming.
- The heavy reliance on CRTs creates administrative burden with additional pressure on business managers and principals, who must manage a high volume of CRT engagement and verify their compliance.
- Current induction for new principals and assistant principals is variable in quality.

“When we began using international recruitment, we had to solve a lot of the issues ourselves. Things were getting bounced around the department - from Schools Workforce to Legal, it did not seem like they talk to each other, we had to keep following it up. We had an issue with visa length vs job length. We were clueless on how the process worked and had to do a lot of reading. We kept badgering for answers but were never given any idea about how long it would take. We were told that it is simple, but then if it is so simple why are legal involved. We need to be able to work through it together. In the end the resolution was to shift from a 4 year to a 2-year position. It would be great if schools could have some kind of flowchart. We know what to do now, but it took a lot of work to understand it.” - Business manager

“It’s fairly useful [ROL] - e.g. can clone a closed position and relist it pretty easily, the hard part is the rules around it rather than the system itself.” - Business manager

Performance and development

The Review found that the adoption of the SOE model as the routine approach to performance and development for teachers is one of a small number of positive large-scale administration and compliance reduction measures adopted by the department in recent years and should be maintained.

School staff told the Review in consultations that prior to the introduction and widespread adoption of the SOE process, they faced significant administrative burden from managing routine performance and development processes, but that this has been streamlined significantly by the SOE.

Only a small number of school leaders expressed concern about loss of formal oversight of performance and development of all staff. Most staff value the regular opportunity to have conversations about performance and development, but none wished to see previous PDP documentation requirements return. Aversion to the inefficient and ‘clunky’ PDP module in eduPay was a significant theme in feedback, with most staff regarding the process as unnecessary and burdensome.

Implementation actions for consideration - department human resource policy and procedures

Managing performance and conduct issues:

- Overhaul the administration of time in lieu to create a simplified, consistent approach across all schools.
- Conduct a thorough review of all HR policies and supporting resources to reduce length and complexity, remove inconsistencies, and update broken links. Once complete, institute a rolling user experience review of all HR policies and supporting resources to maintain quality.
- Take steps to improve the consistency of HR advice, including using AI tools and developing a formalised HR knowledge-sharing intranet site for principals, business managers and school HR administrators.
- Set a target for digitisation of remaining hard copy personnel files for current employees and provide a system for timely and seamless transfer of digital records when staff move between schools.

Recruitment and induction administration:

- Develop clearer guidelines and flowcharts to help school staff manage international recruitment and pre-service teacher placements.
- Improve ROL to make the platform more user-friendly, streamlined, and accessible to international candidates.
- Develop a system to automatically send contracts out to new hires to significantly reduce or remove this workload from school staff.
- Offer a centralised recruitment option for schools to opt into if it suits their needs, in particular for harder-to-staff schools.
- Remove the requirement for applicants to prepare written responses to KSC.

Performance and development:

- Permanently adopt the SOE process as the primary performance and development tool for all school staff, formally retiring PDPs.

Policy, compliance support, and school review

Recommendations

- 3. Establish a team with authority:** Designate a team in the department to set targets for administrative and compliance workload reduction and monitor the administrative impact of new programs and policies.
- 6. Simplify school planning documentation:** While recognising the importance of school planning, simplify school planning documentation. This includes shortening Annual Implementation Plans (AIPs) and School Strategic Plans (SSPs) and removing the need to report specific expenditure information in these documents given financial accountability is assured through other processes.

The Review found that PAL and the School Policy Templates Portal are seen as positive steps forward from the department. Further, it found that the School Compliance Unit's approach to supporting schools with minimum standards compliance is significantly reducing workload. The Review found the following areas for improvement to administration and compliance workload for school staff:

- School staff would strongly prefer more department-wide, standard policies (on PAL), rather than policies that have to be adapted at the school level (local policies, on the School Policy Templates Portal).
- Principals are overwhelmed by constant policy updates, but they may be misinterpreting what is required.
- Policy owners are not incentivised to simplify policies.

“The emails we receive weekly from the department to send, but [it is] not so easy to do each action. As an example, one of the email items was for policy updates. It contained numerous updates to policies from their library. The expectation that a principal would have time to match each policy up against their existing version and make the necessary updates would require a full-time administrative job for about 3 days. And that would be if that was the only thing you had to do.” – Principal

“Simplify forms. The Policy docs provided by the department are helpful (thanks) as prior to that school staff had to develop Policies on their own. A lot of work. Provide school staff with a one page, maybe 2-page doc. and not 20 - 30 pages. Break things down into bite sized readable chunks. Simple English that appeals to the masses. Not something you have to read 3 times to get what they're talking about. Some things are too convoluted to aid speed of execution.” – Education support staff (Administration)

Pre-Review Self-Evaluation and School Strategic Plans

The school performance review has 2 main components: the Pre-Review Self-Evaluation (PRSE), where schools analyse their own data using the SPOT, and an independent review panel. Schools are asked to collect multiple data sets to inform this process, including student performance, school demographics, mandated national and international assessment data, school survey data and evidence that supports AIP outcomes.

SSPs are a 4-year plan that outlines a school's philosophy, goals, targets, and strategies for improving student outcomes. Developed in consultation with staff and the community and endorsed by the SEIL, the SSP provides a strategic framework that informs school operations and guides staff performance and development.

School staff generally report that they see the purpose in the school review process, particularly with the discussion piece with school council, teachers, and families. The administrative work that goes along with the school review process is also seen as generally purposeful as school leaders understand why they have to gather data and document strategic plans. Compared to OHS, facilities, and HR work, the school review process is relatively not a large administrative burden. However, there are a few changes that school leaders would like to see to simplify the process and reduce the potential for school staff to over-do the work during the PRSE.

Key findings:

- **SPOT is well-liked by most school leaders:** About 80% of survey respondents rated SPOT as ‘very’ or ‘somewhat’ user-friendly which ranked it as one of the highest rated digital systems in our survey.
- **The funding section on SPOT is the main frustration:** School leaders detect that this is a duplication of work they already have to do separately for budgeting and financial acquittals. They also report that their responses on SPOT do not reflect real spending, and therefore do not see the purpose of this data collection.
- **Some small schools struggle with the school review process:** It is the same process for small and big schools, but less people to share the load. Some small schools that group together for the school review have found that to be a successful model.
- **The PRSE can be onerous administrative work, but some school staff might be over-doing it:** School leaders reported a lack of clarity on how far to go with the pre-work for the school review. One principal reported that it took more than 150 hours for her to do the pre-review work, and 5 days to write up the details. School leaders would like to see more parameters on the evidence they should provide, and a minimalist approach to the documentation and data collection.

“The whole school review process needs overhauling. Principals spend their whole review year, locked in their offices, away from teaching and learning to complete paperwork that's barely looked at.” - Principal

Annual Improvement Plans and Annual Reports

The AIP operationalises the goals and strategies outlined in the SSP, detailing the specific actions, intended outcomes, and resources required for implementation. The AIP includes detailed plans for professional learning and funding, aligning school activities with both departmental objectives and school-specific priorities. School

staff operationalise their SSP through the AIP, which details action plans, funding, professional learning, and key improvement strategies aligned with departmental objectives.

The Review found that the AIP is not a top administrative burden for school staff. However, there are some opportunities for change which can reduce workload each year, as outlined in the recommendations below.

Audits and assurance activities

The department conducts regular, targeted, and ad hoc audits to ensure that schools meet compliance, legislative, and risk management requirements. These audits cover various areas, including finance, OHS and enrolment verification, and are coordinated to minimise disruption while ensuring that schools meet the necessary standards. School leaders manage the audit process by liaising with auditors, preparing required documentation, and addressing audit findings, often reallocating resources to meet compliance needs.

The Review found that audits are time-consuming and many school leaders and business managers say that they would like the audit to provide them with more feedback, so that they can learn and grow from the experience. Some school staff suggested that audit planning should consider materiality, as they can see greater school and system benefit from the cost and time required to audit a \$100,000 camp compared to a \$500 excursion. The Review found that externally contracted auditors sometimes inadvertently add to workload due to their limited understanding of school operations (for example, not understanding the combined accrual/cash accounting system).

The department's Financial Services division is now using central data to identify irregularities and target fraud without involving so much information from school staff. This process requires no additional input from school staff (beyond the original administrative data collection in CASE21 or other systems), though schools with red flags may experience targeted audits which by necessity do generate workload. As the department moves to more centralised data systems, there may be an opportunity to reduce the number of audits by better targeting them.

The department has an established function in place to schedule audit activities across a school year. This process attempts to balance school staff workload considerations alongside the need for assurance of important regulatory requirements. Despite this function, the Review heard from some school staff that they continue to experience multiple audits and other compliance checks in concentrated periods. The department advised the Review that every effort is made to schedule audits and assurance activities to avoid overlaps and manage workloads but that from time to time there may be compelling reasons why audits cannot be moved from a particular period (for example if there is a report of concerning financial activity and also multiple OHS incidents within a school that require further review).

This suggests that the department needs to take further steps to reduce the scope, scale, or frequency of audits and assurance activities, or to provide additional resourcing in schools to manage audit related workload.

“I have just had both my VRQA and OHS Audits. Because these are different external contractors that oversee these areas, I have had to submit several policies twice. E.g. First Aid was signed off as compliant by the VRQA, I then had to have it assessed by the OHS auditor. Double up, who is the right person to say it is compliant?” - Principal

“Audit processes require a huge amount of data to be uploaded even for onsite audits. Very time-consuming when already available within the CASES system and could be accessed directly.” - Business manager

Implementation actions for consideration - policy, compliance support, and school review

- Work with the VRQA to increase the number of default departmental policies that, for the purposes of compliance with Minimum Standards, can apply to all government schools without local adaptation.
- Significantly reduce the administrative workload required for financial accountability (both in SPOT and the STFG portal) in relation to small program-specific funding allocations (e.g. up to \$25,000) to ensure workload is proportionate to the amount of funding provided.

- Further reduce the number of audits and assurance activities conducted in a single school year.
- Reduce the number of audits and assurance activities that contact individual schools by using more central data to identify irregularities and better target audit activities to areas of concern.
- Lower the stakes of minor audits (e.g. of tree or ramp safety) by rebranding them as routine inspections or checks and emphasising a focus on practical improvements rather than procedural compliance.
- Modernise school council election processes by updating Ministerial Order 1280 to permit electronic voting and providing a common electronic voting system.
- Simplify SPOT by removing funding fields and adding pre-fill and dropdown options to speed up documentation.
- Work with school staff to design a new approach to communicating the list of PAL updates each term, to address the perception that the list requires principals to read and action dozens of items.
- Invest in teams to provide additional practical, hands-on support for the PRSE and audits, based on the successful School Compliance Unit model for supporting schools with minimum standards compliance. Update procedures to include a suggested maximum time school staff should expect to spend completing and preparing for these activities.
- Reduce the size of AIPs and SSPs to approximately 2 pages.
- Reduce required school council meetings to 5 per year and explicitly restrict the scope of school councils to core duties.
- Investigate further separation of the compliance and performance components of the School Review by offsetting the 2 components by 12 months.

School councils

Recommendations

- 8. Reduce the number of school council meetings and tighten school council scope:** While retaining parent and community engagement in school operations and strategic direction, reduce the number of required school council meetings to a maximum of 5 per year and confine the scope of school councils to improve consistency across all schools.

School councils are central to school governance, overseeing key functions such as financial management, policy development, and the preparation and review of strategic documents, including the SSP and AIP. Councils guide the school's strategic direction and are responsible for ensuring school staff adhere to legal and regulatory obligations. School leaders organise annual school council elections. School leaders also ensure councils meet at least 8 times a year, including a public reporting meeting.

The Review found that the process for electing school council members could be improved simply by allowing school staff to enact a digital ballot system. The paper-based requirements create a lot of additional work for school staff. Other states have successfully adopted digital ballot systems.

The Review found that a larger issue with school councils is that, as the compliance work has expanded for school staff, it has also expanded for school councils. School leaders have to take policies to school council for approval, even when they are virtually the same policy for every single school in the state. School councils are extremely variable. The least active school councils require pressure from principals to make sure they are meeting the compliance requirements. The most active school councils create numerous additional sub-committees, each with additional administrative workload for leaders and school staff.

There is a desire to reduce the scope of school councils to what really matters most to parents and the community. It may make sense, for example for school councils to decide on school uniforms, but not as much sense for school councils to approve the school cash-on-hand policy. One of the Review's overarching recommendations is to have more standardisation of policy across schools. If the department moves this way, it makes sense to reimagine the roles and responsibilities of school councils.

“Currently school council elections have to be done physically. This year we have 1120 families. We had to print off over 1100 ballots that are then individually stuffed into envelopes, and then an additional 2 envelopes are put in the larger envelope for the votes to be returned to the school. We then have to open and count every vote.” – Business manager

Finance

Schools operate under a devolved decision-making and financial management system where financial responsibility is shared between the school council and the principal. Staff involved in financial management must comply with mandatory requirements outlined in the department’s Finance Manual, which details compliance, control, and accountability expectations for school finances.

The Review found the biggest issues school staff experience are overly restrictive rules regarding documentation and outdated financial management systems.

The Review found that:

- **An outdated finance system and limited data integration creates inefficiency and risk:** CASE21 is outdated and lags behind systems used in similar jurisdictions and sectors. While some processes are semi-automated, many still require double or triple entry from other systems, adding to workload, complexity, and risk.
- **The SASH program is highly regarded:** The program provides effective remote business manager support to small schools who cannot afford an on-site business manager.
- **School Finance Liaison Officers and Strategic Finance Management Advisors provide practical, positive supports:** School staff are happy with the access to responsive support and the way they are allocated to areas across the state.
- **The Finance Manual on PAL is excellent quality:** The guide is easy to navigate and provides schools with clear steps.
- **Accountability requirements are often disproportionate to funding:** The administrative burden of managing funding and grants, including reporting and acquittal requirements, can be cumbersome and for small amounts of money can be excessive.
- **Uncertainty over administration spending restricts support for finance/administration roles:** School staff lack explicit guidance on using SRP and equity funding for administration support.
- **Delegations and portal access settings do not reflect the risk:** Current settings for delegations and portal access are prohibitive to efficient work practices. Limited access can promote poor practice and workarounds that potentially create a bigger risk and impact effectiveness in processes such as sign-off of STFG Portal claims, Fringe Benefits Tax return, or short-term leave reimbursements.

Procurement

Procurement panels have the potential to reduce workload: The panels are relatively new but assist school staff to reduce the paperwork required in normal procurement. However, school staff would like more input into procurements and provider selection.

Implementation actions for consideration - finance and procurement

- Increase resourcing for procurement and legal teams to enable expansion of available panel categories and reduce procurement administration requirements in common spending categories. Consult closely with a range of school staff (including when selecting suppliers) in order to align new panels to school requirements.
- Review financial requirements against red tape reduction principles to reduce workload that is not purposeful. As part of this, review commonly frustrating issues like:
 - requiring school staff to get principal and school council sign off on every transaction

- requiring banking be conducted with particular banks that are not accessible in regional areas and/or requiring banking to be conducted on a fixed schedule
- barriers to buying small dollar resources without advanced paperwork
- the multi-step process for purchase orders.
- Investigate options to allow schools to operate on a single financial year rather than producing duplicate financial information to align with calendar and financial years in different circumstances. Conduct any 'translation' activities between calendar and financial years at the system level, where these are required (e.g. for audits or whole of government financial reporting).
- Open up the SASH to larger schools that would like to outsource financial tasks.

Asset management

Recommendations

- 9. Reallocate more asset management responsibilities from schools where appropriate:** To support principals to prioritise the daily management of school operations, increasingly move most asset management responsibility (including AIMS) away from schools in favour of corporate or regionally based staff. These staff would then take over the delivery of these responsibilities, similar to models in some other jurisdictions. This may include a staged approach which takes into account school size, level of administrative burden, costs, and risk of centralising various functions over the short, medium, and long term.

Under the *Education and Training Reform Act 2006*, school asset planning and management is a shared responsibility between corporate staff, school principals, and school councils. In this model, principals act as asset managers, responsible for managing school buildings and grounds to ensure they remain safe, compliant, and well-maintained.

School councils provide general oversight of maintenance activities, financial operations, and workplace safety, ensuring buildings and grounds are well maintained. They also oversee budget development, participate in strategic planning, and review policies to align with school values and priorities.

The VSBA delivers maintenance programs, manages most capital works projects, responds to emergency and unforeseen incidents and events, and provides dedicated support to schools through training and systems to help them fulfill their asset management responsibilities.

The Review found that the management of school infrastructure places a significant administrative burden on principals and school staff. This is the largest frustration for school principals. The combination of unclear roles, complex systems, and extensive compliance requirements has created a challenging environment. This frustration is exacerbated for smaller schools with limited resources. School staff accept that asset management tasks contribute to the safety and longevity of assets, but do not want to continue to be responsible for the majority of these tasks at a local level.

The Review found that:

- **Expansive assessment management responsibility puts a large burden on principals**, particularly in medium and small sized schools that do not have facilities managers. Principals are unable to 'keep up' with the asset management responsibilities.
- **Other states place minimal assessment management responsibility on school staff.** For example, South Australian principals do not manage any planned maintenance, asset data entry, or rolling facilities evaluations – these are all handled externally to the school.
- **There are communication issues with the VSBA.** Principals reported that the VSBA's processes and communication are often unclear, leaving them unsure about their specific roles and responsibilities.

"VSBA projects are managed by different teams who do not speak to each other, which creates incredible burden on school staff to manage." - Principal

- **Managing building projects distracts principals from core duties.** Principals are responsible for managing low-value maintenance and grounds projects which are typically initiated by the school. For higher-value projects, including most projects funded in the State Budget, the engagement and management of contractors is undertaken by the VSBA.
- **ESM audit centralisation is good, but school staff want it to go further.** The ESM auditing was centralised to reduce school workload and achieve full compliance for the safety of school staff and students. Considering the overall size of the program, a small number of schools expressed concerns with how the rollout was communicated and executed. Many school staff support the centralisation as a way to reduce administrative workload. However, school staff would like to have both the ESM activities and the rectification centrally managed.
- **The Small Schools Program is an early success.** This new program provides a shared facilities manager across a network of small schools. An initial pilot indicated significantly reduced school staff workload. This successful small schools program initiative can be used as a model for improved support for all schools.
- **AIMS is overly complex and difficult to use.** AIMS is designed to assist with maintenance and compliance; however, it is seen as overly complicated and challenging to navigate. In the Review's survey of school staff, AIMS had the lowest ratings of any digital platform with 45% of respondents saying AIMS is 'very challenging' to use, 12% of respondents said AIMS was 'somewhat user-friendly' and zero said that AIMS was 'very user-friendly'.
- **Grant processes are bureaucratic and burdensome.** The process for demonstrating eligibility for VSBA-led programs that deliver updates to school buildings and facilities is considered overly bureaucratic. This issue particularly affects schools with fewer resources, especially those needing upgrades that lack the funding and staff to manage the administrative workload.
- **School staff want better customer service.** Principals reported unclear communication and a lack of responsive support from the VSBA, making it difficult to navigate their roles, asset management, and infrastructure projects. Improved practical support, clearer processes, and better dispute resolution would help address these concerns. The Review found that as part of historic as well as recent reforms, the VSBA has implemented a range of measures to support schools to manage their assets and reduce administrative burden.

The VSBA offers specific training to schools, for example, through 'Bricks and Mortar training', which provides school leaders with an overview of day-to-day maintenance requirements and ensures schools have adequately trained and capable personnel for asset management. In addition to training, the VSBA offers one-on-one coaching through 'Technical Leadership Coaches' (who are former principals) to support schools in administering and scheduling asset management activities.

The VSBA has also taken steps to deliver some functions centrally, removing the need for schools to manage or deliver some asset management functions including:

- **Essential Safety Measures:** since 2024, the VSBA has run a centralised program for the delivery of ESM inspection and testing and annual auditing across all Victorian Government schools to reduce administrative burden, reduce compliance risk and improve safety for school staff and students.
- **Planned Maintenance Program:** since mid-2023, the VSBA has delivered the vast majority of projects under the Planned Maintenance Program, which provides funding to around 300 schools per year. Schools now only deliver low-value projects where no additional risk factors are identified.

The VSBA has also implemented a customer service uplift program, which has included an organisation-wide focus on customer service, an updated complaints and feedback process, additional staff training and new products such as a 'Who's who for schools' document. Nevertheless, while new processes have been put into place, there remains room for improvement to ensure that schools are appropriately supported to manage their assets.

“Currently the Contractor Management Policy requires school staff to keep a register of all contractors. The VSBA also requires schools to enter all of the same contractor information into its Asset Information Management System (AIMS). I also believe

that a contractor module is being developed for eduSafe Plus. This would be 3 different data points of the same information.” – Education support staff (facilities)

Regular asset checks

School staff experience a lot of checks and assurance activities which are not technically audits, however to school staff they resemble audits and are often labelled as such. These include managing multiple checks/inspections of facilities and grounds including playground audits, tree audits, monthly testing of drinking water, annual septic tank testing, water supply, gas appliances, playground equipment, shade sails and so on. When school staff talk about ‘audits’, they often put all these requirements in the same bucket, because they all drive administrative burden in the same way.

AIMS provides schools with regular system generated reminders to schools on AIMS tasks that need to be completed. These reminders are a standard feature for asset management systems.

These reminders are separate from more detailed policy updates and specific changes, which are communicated through standard channels like School Update and PAL.

School staff do not question the need for these checks to be performed in the interests of staff and student safety but want the VSBA to arrange them on behalf of schools to ease the administrative requirements and ensure that processes are managed by those with appropriate expertise.

“Assign VSBA liaison officers or advisors to school staff, that would be the first point of call for facilities/buildings/maintenance queries, regardless of the team that will eventually be responsible for any project. Ideally, this person would learn about the school, understand the school's interrelated and longer-term needs, and assist the school in navigating the various processes and branches of the VSBA.” - Principal

“More centralised and consistent support of compliance tasks. [The department] to take responsibility for maintenance and OHS tasks e.g. if you require monthly testing of drinking water, annual septic tank testing, tree audits and maintenance, etc that someone in [the department] is responsible for coming and doing these tasks.” - Principal

Implementation actions for consideration – asset management

The Review recommends that most asset management is removed from school responsibilities in line with other jurisdictions. The change will not happen immediately, so in the short term, the Review also suggests the following actions for the department's considerations:

- Streamline ESM by integrating rectification tasks directly into the ESM Inspection and Testing process (for example, having the same contractor manage both inspections and follow-up corrections).
 - Improve VSBA customer service with the aim of preventing administrative workload for schools:
 - set clear response timelines and service standards for different types of VSBA projects
 - create a single point of contact for school staff with general asset management enquiries, modelled on the Principal Advisory Service
 - designate client managers for each school who can build familiarity with local issues and relationships with school staff
 - establish a function tasked with intervening early to resolve disputes before they escalate.
- Resource the expansion of the Small Schools Program to support small and medium sized schools which do not have the resources to staff for asset management, workers compensation and OHS responsibilities.

- Review AIMS notification settings with a goal to significantly reduce the number of notifications and ensure that school staff are not sent email notifications on holidays or after hours unless the issue is urgent.

Administration for complaints

The Review found that complaints processes are a significant administrative burden and stress on school staff, particularly when complaints are allowed to escalate.

The management of parent complaints in schools is governed by the department's parent complaint policy. The policy outlines a complaint-handling system guided by a three-tier framework that prioritises local resolution at the school level, with escalation options to the region and central offices. Principals and school leaders must manage complaints fairly, ensuring student wellbeing and support to remain engaged in learning is prioritised and that detailed records are kept.

The Review found that:

- Individual school complaints policies can differ, and schools would like more consistency in a department-wide approach.
- Complaints are administration-heavy and can be especially time-consuming for school leaders, taking the away from core duties. Complex administration unnecessarily exacerbates stressful situations.
- Other jurisdictions across Australia are providing more supports to school leaders handling complaints, including simplifying the administrative and paperwork requirements so that principals can stay focused on teaching and learning.

Implementation actions for consideration - administration for complaints

- Require adoption of a standard complaints policy for all schools and parents, based on the existing template policy, to ensure consistency across schools.
- Develop a complaints tool kit with practical resources to support school staff to manage and resolve complaints including templates and exemplars. Consider piloting automated systems to assist in low-level complaint management.
- Review the current professional learning available to school staff (all roles) in areas relevant to building positive relationships and reducing conflict, including communications, mediation and complaints resolution.
- Take steps to educate the Victorian community around the purpose and role of contemporary schools, including building positive school-family partnerships, in line with efforts in health and transport sectors and in other jurisdictions.

Student transport administration

The Review found that the model for local administration of student transportation by schools is complex and inefficient, inadequately resourced at the school level, and can result in conflict between schools and families and/or between schools themselves.

Staff in some schools in regional Victoria as well as those in special schools across the state have additional responsibilities to coordinate transportation for some or all of their students in order to support them to attend school.

The School Bus Program (SBP) supports students living in rural and regional Victoria with transport to school. The SBP is coordinated by one school across a particular area or network of local schools. Staff at Coordinating Schools must manage the SBP services according to departmental guidelines, and (at the time of writing) receive

additional funding to contribute to the cost of this role.¹⁵ Other schools in the network or area are referred to as Client Schools.

Staff at Client Schools have several responsibilities. They must distribute information to families during enrolment and in response to inquiries about the SBP services available in their area. They must also collect application forms from students who wish to access these services and forward them to the Coordinating School. Staff at Client Schools must collect any fares from students and ensure that there is adequate supervision of students getting on and off the buses at their school.

The department is currently rolling out the Student Travel Assistance Portal, which will remove some of the administrative responsibilities of staff at Coordinating and Client schools including collecting and processing application forms, maintaining bus attendance rolls and remitting bus fares to the department.

The Students with Disabilities Transport Program (SDTP) provides transport for eligible students to and from a specialist or integrated school. Principals of participating schools are responsible for managing the SDTP services according to department guidelines. They must have a Memorandum of Understanding (MOU) with each bus operator and assess student travel applications against eligibility criteria. Information from applications must be entered into CASE21.

Each student using SDTP services needs an individual travel plan that considers their specific needs and potential emergencies. Principals are required to ensure bus operators have updated information about students, including travel arrangements. They also need to create an emergency management plan for incidents like bus breakdowns or accidents and apply a Risk Management Framework to address potential risks.

Training for relevant school and bus staff is compulsory, including completion of online learning modules. Principals must review and confirm the accuracy of monthly invoices from transport operations. Any operational issues affecting students or transport services must be reported to the department. While principals can delegate transport coordination, they must oversee compliance with SDTP policies. All school staff share the responsibility of assessing and mitigating risks related to SDTP services.

The Review found that:

- Staff in SBP Coordinating Schools carry significant additional administrative and compliance work, which is complex and often involves managing unexpected problems that can cause a sudden increase in work activity for school leaders, business managers and other office staff, such as a bus breakdown.
- Some school staff reported issues extracting the information they need from the new student travel assistance portal. The portal regularly takes up to 20 minutes to load when school staff are trying to access it.
- The paperwork may delay student access to bus services. The Review heard accounts of newly enrolled students who missed school while waiting for route variation paperwork to be processed.
- The department awards contracts by route rather than by school, meaning some school staff must manage contracts and relationships with multiple bus companies with different staff, digital systems, requirements, preferences and service standards. This gives rise to a range of issues including communication inefficiencies, double and triple handling of information, lack of clarity around duty of care and responsibilities, variability in drivers and chaperones, and school staff needing to be skilled in accessing multiple digital platforms and apps provided by suppliers.
- High-quality transport providers with good working relationships with school staff make management of the program somewhat easier, but school staff have limited capacity to influence the selection of these providers.
- The department provides policies, guidelines and resources, but does not provide hands-on support to school staff to manage complex issues.

“We are getting calls out of hours [from bus companies] to make calls to parents. We get a lot of blame and abuse from parents when things go wrong. The [department] isn’t helpful, they just bounce things back. We need a department-parent helpline to help resolve the issues, not just put it on schools.” - Principal

Implementation actions for consideration – student transport administration

School bus policy and coordination is complex. Responsibility for bus coordination should be considered as part of the broader work on the centralisation of administrative fundings. In addition, the Review outlines the following suggested actions for the department:

- Work collaboratively with specialist school staff to reduce the complexity of administration of student transport services for students in these settings, for example by reducing the number of providers or standardising the services offered (including IT platforms and customer service expectations).

Enrolments administration

Recommendation

26. Digitise and centralise elements of the enrolment process: To reduce and streamline school enrolment administration, continue and expand the Student Insight Pilot and remove secondary transition from primary school responsibility.

The Review found that enrolment systems, manual verification requirements, and inconsistencies in department guidance create significant challenges for school staff, resulting in higher administrative workloads and operational inefficiencies.

Enrolment procedures in schools are guided by a policy framework aimed at ensuring fairness, accessibility, and compliance with Victorian and Australian laws. School staff are responsible for following these guidelines while managing student enrolments, including those for Foundation, Year 7 placement, and student transfers. The department enrolment policy is informed by relevant legislation, the policy ensures every eligible child can attend their designated neighbourhood school while allowing flexibility for schools with specialist entry criteria, such as specialist schools. The policy also details entitlements for out-of-zone enrolments when space permits. The department provides consistent enrolment timelines, which are essential for both procedural compliance and resource planning across the school system.

School staff must comply with the enrolment guidelines, including the collection of mandatory student information, proof of residency and visa details for international students. School staff are required to ensure that their enrolment processes are fair and equitable, ensuring that vulnerable student populations are not disadvantaged during the enrolment process.

Box 1: Student Insight pilot – Victoria

The department has been piloting a new digital system, *Student Insight*, to assist in streamlining and reducing the administrative burden that comes with student enrolments.

Department staff sought and received input from over 100 schools to help design the system, recognising school staff as the major stakeholders and end users. Led by the Information Management and Technology Division (IMTD), the primary goal of this initiative is to reduce the administrative burden on school staff, acknowledging the crucial role that technological solutions play in achieving this.

Currently, over 54 digital systems are used by school staff to manage student enrolment data across the school system. This pilot seeks to test a unified system for the entire sector, reducing the administrative burden of enrolment for schools by implementing a seamless student identification process. The goal is for student identification information to follow them throughout their entire educational journey, from foundation entry to exiting secondary school.

The success of this pilot will open up further opportunities to implement sector-wide digital solutions aimed at reducing the administrative burden on schools. IMTD has been developing a Digital Roadmap with this goal in

mind. While the technological solutions available to support schools are vast, co-designing and trialling each initiative with schools is seen as essential to the success of any system design.

The Review found that school staff are grappling with managing enrolments due to disparities between departmental guidelines and actual practices. They are also facing challenges with digital enrolment systems and manual verification processes. As a result, enrolment procedures are overly complex and inefficient, leading to an unnecessary administrative burden.

School staff commonly reported that:

- The new Insight platform appears to reduce administrative time, but it is new and just being trialled at this stage. However, this digital system is exactly what school staff want to move to.
- Most school staff still use paper enrolment forms reducing opportunities to streamline the process with digital alternatives that could ease administrative workload.
- School staff must cross-check multiple forms of evidence for family addresses and international student visa details, and this repetitive task significantly adds to the administrative load.
- In addition to having to complete paper forms, verify addresses and other details manually, and enter data after the fact into CASE21, discrepancies between paper forms and digital systems create additional manual work for staff.
- Schools affected by parent enrolment appeals often face complex, unclear processes with insufficient involvement or communication from the department, leading to frustration and extra work for staff. School staff often perceive the department is inconsistent in its response to appeals.
- Inconsistent messages and advice from the department to school staff and parents regarding enrolment policies, such as student capacity limits and out-of-zone enrolments, create confusion for everyone involved and an additional administrative burden for school staff.
- The selective enrolment process for specialist schools is administratively complex and unclear, requiring significant effort to support families and navigate departmental requirements.

“CASE21 does not align to the enrolment paperwork; you have to click in and out of different sections. We need enrolment data to be correct for funding, our [principal] team will help manage this by connecting with the families to help ensure it is correct, this just adds more to their work.” - Business manager

Implementation actions for consideration- enrolment administration

- Ensure alignment between paper enrolment forms and digital systems like CASE21 to minimise processing inefficiencies.
- Remove the requirement for the Specialist School Enrolment Verification Request form.
- Review specialist school enrolment procedures with a view to reducing administrative burden. Develop clearer guidance and structured support for specialist school enrolments and help staff in these schools manage these complex processes.
- Review the procedures for handling enrolment appeals at schools where accommodation is at or near capacity and/or where appeals are frequent or complex, with a view to both reducing administrative workload and supporting the wellbeing of school staff.

Administration from planning, assessment, and reporting

Recommendations

13. Simplify semesterly reporting: Schools all do reporting differently, so there is an opportunity for the department to make this more consistent for schools and families. To do this, clarify what is and is not required, provide report exemplars, and recommended standard approaches to schools.

14. Provide coaching to schools with high administrative workload: Recognising that efficiently managing essential compliance and administrative activity can require expertise in process change, provide on-the-ground coaching for schools experiencing high administrative burden to assist in improving systems, particularly focusing on addressing teacher workload in data collection, scheduling and lesson planning.

15. Clarify expectations and create more standard approaches: Specify what is and is not required in policies related to documentation of curriculum and assessment in schools. Provide exemplars of efficient lesson planning, assessment, and data collection practices which are used in high-performing schools to both reduce administrative workload and improve teaching and learning.

There are 3 key issues in this section:

- Administration from planning and lesson documentation.
- Administration from assessment and data collection.
- Administration from semesterly reporting to families.

For each of these issues, the Review has found that there is a high variance between schools. As described in *Key findings*, there are many high-performing schools that have developed internal systems which operate effectively to reduce school staff administrative workload. In these schools with particularly efficient administrative practices, the practices are beneficial for both school staff and for students. There are sometimes misconceptions that schools reducing administrative workload are cutting corners, but the Review has found that high-performing schools that are effective at reducing administrative work are also effective at improving student outcomes.

The Review makes recommendations for schools about what they should do to implement efficient administrative practices more widely. However, the department must also take responsibility for ensuring these efficient administrative practices are in every school. This section describes the recommendations for the department.

Administration from planning and lesson documentation

A core part of teacher workload is lesson planning, and most of that work is not administrative. However, there are some administrative elements of this work that vary significantly between schools. The Review found that schools with centralised, shared curriculum materials tend to have lower administrative workloads because teachers spend less time creating the documentation related to lessons and more time on improving and implementing lessons.

Key issues with planning and lesson documentation:

- Some schools are requiring teachers to upload curriculum documents on multiple portals. This may be based on schools believing this is required by policy for compliance.
- Schools vary in how much lesson documentation is required, and there is no clear guidance on what is most effective and also meets compliance requirements.

There is miscommunication to teachers and school leaders about what lesson documentation they should create. The below quote exemplifies a common experience from many teachers:

“Reduce the amount of planning requirements which are doubled up. A year planner, a term planner, a weekly planner, a unit planner, lesson plans etc. There is a lot of double up in the paperwork we need to do for each lesson and a lot is for the benefit of the department - not the students. Still hold staff accountable for their planning and lessons but have less paperwork and repetitive forms.” - Teacher

In the above quote, the teacher’s school is enforcing these documentation requirements, and it is likely that leaders at the school believe that this documentation is either required by policy or recommended as best practice. The department could clarify what requirements are strictly for accountability purposes, and what are recommended best practices.

Box 21: Ofsted Clarification for Schools – Example of how the UK clarified requirements

In the UK, the Office for Standards in Education, Children's Services and Skills (Ofsted) inspects schools to ensure quality and compliance. Ofsted issued a 'clarification for schools' in its 2021 inspection handbook to help ensure schools were not misunderstanding what curriculum documentation they were required to have.

This is an example of a system providing clarification of what is *not* required.

An excerpt of the Ofsted clarification is below.

Ofsted will not:

- *grade individual lessons*
- *advocate a particular method of planning (including lesson planning), teaching or assessment - it is up to schools to determine their practices, and it is up to leadership teams to justify these on their own merits rather than by referring to this handbook.*

Ofsted does not require schools to provide:

- *curriculum planning in any specific format*
- *individual lesson plans*
- *previous lesson plans.*

Ofsted does not specify:

- *how planning (including curriculum and lesson planning) should be set out, the length of time it should take or the amount of detail it should contain.*

Administration of assessment and data collection

Assessment is a core responsibility for teachers. Teachers do regular formative assessments as well as summative assessments. Every school has different assessment practices and different protocols around data entry and analysis. Assessment can include administrative tasks such as data entry and dealing with digital systems.

The Review found that there were differences between schools in how teachers perceived the administrative workload related to assessment. Overall, teachers and leaders would like more consistency between schools and more resources from the department to support efficient administrative assessment practices. This includes having system-wide digital platforms that can both communicate to parents and also help school staff analyse and visualise assessment data.

Some teachers are frustrated by their school-based expectations for assessment data to be collected and can feel that the entry of this information into digital platforms for no clear purpose and is not used to improve the teaching and learning.

Although there is variation between schools, many teachers saw the solutions sitting with the department. They would like to see the department clarify how and when to assess students and to provide quality assessment tools for school staff to choose from.

"It is so important to collect data, but it has to be used." -Teacher

"We get a lot of commentary on which things are easy to navigate and get meaningful data out of, visual interfaces/summaries/dashboards are good. An example of this is the Digital Assessment Library which has great assessments, the quality is much better than the 3rd party offerings, but the user experience lets the department down. It is a terrible platform - so people don't use it. We need assessment platforms that are quick to use and understand, intuitive and user-friendly." - Teacher

Administration for semesterly reporting to families

Teachers are required to report student achievement and progress to parents at least twice per year aligned with the standards set by the Victorian Curriculum. This process ensures parents have accessible and meaningful information about their child's academic performance and wellbeing. These requirements are not in scope for change. Instead, the Review has examined the administrative tasks behind reporting and how different approaches to semesterly reporting can impact the administrative workload of school staff.

The Review found that there are large differences between schools in how streamlined the reporting process is. Schools that have minimised teacher workload, but still provide high quality reports to parents, exist across Victoria and are models for what the future of reporting can look like to be best practice both for families and for teacher (see case study in Appendix D: Case Studies for details).

Additionally, more detailed semesterly reports to parents do not always lead to more parental engagement. The Review found that most schools have a significant number of parents who never open the student reports. There is a trade-off between spending time on the report documents and spending time calling parents or holding conferences. It is therefore possible that reducing the report documentation requirements could allow teachers to spend time on more effective ways to increase parental engagement.

Implementation actions for consideration – planning, assessment, and reporting

- Codify and share effective administrative practices
 - Create semesterly report exemplars that reduce teacher workload but still meet policy requirements
 - Create assessment data collection advice on how schools can reduce data collection that they are not using
 - Create case studies of schools that have made lesson planning documentation more effective and less administration-heavy.
- Clarify what is not required
 - In policy, clarify the details on semesterly reports that are not required (e.g. scoring on each Victorian Curriculum content description and detailed comments)
 - Clarify what assessment data collection schools are required, and not required to do to encourage more consistency
 - Clarify what lesson planning documentation is required for compliance versus what is not required.
- Recommend maximum and/or standard approaches
 - Recommend a minimal standard semesterly report structure
 - Recommend that schools do not require teachers upload lesson documentation to multiple portals.
- Provide operating model guidance
 - Curate a list of third-party tools that help reduce the workload of assessment, data entry and reporting .
- Intervene in schools with low shielding and buffering results
 - Identify the five per cent of schools that have consistently low shielding and buffering results from the School Staff Survey and send a support team to help them establish more effective and efficient systems.

Efficient administrative practices in schools

Schools that have strong systems, clear roles and responsibilities, and adherence to priorities find that improving teaching, learning and wellbeing goes along with reducing administrative and compliance workload for staff.

This section codifies a number of efficient administrative practices that were identified in the Review. Efficient administrative practices exist in all types of schools, including schools of different sizes and schools working in low socioeconomic contexts. The efficient administrative practices all comply with existing department policies and meet all regulatory requirements. In fact, schools with efficient administrative practices are often high performing in both student outcomes as well as staff outcomes.

The Review recommends that schools adopt the efficient administrative practices described in this section. However, it is not just the responsibility of schools to ensure that these practices are implemented. This report also outlines recommendations for the department to support schools with efficient administrative practices.

Role of schools and the department in spreading efficient administrative practices:

- **At the school level:** Implement efficient administrative practices, set targets for administrative workload reduction, and establish a process to continuously review administrative workload.
- **Role of the department:** Codify and spread efficient administrative practices by providing exemplars, clear guidance about what is and what is *not* required, remove barriers to schools adopting efficient administrative practices, and intervene with schools that have consistently high admin workloads to offer more intensive support.

Efficient administrative practices found in the Review

Below is a summary of the efficient administrative practices, by category, which are already in schools. These practices are summarised briefly below and explained in more detail later in this section of the report.

Meetings: efficient administrative meeting practices in schools

- Use meeting norms and simple agendas. Principals and middle leaders in schools run efficient meetings with an agenda, and all staff set and stick to meeting norms.
- Hold only a few whole-staff meetings per term. This helps make these meetings feel more purposeful and forces administrative information to be distributed via less time-consuming methods.
- Staff are not required to attend meetings that are not directly relevant. This ensures meetings are more purposeful and reduces the feeling that attending meetings is a compliance activity.
- Professional Learning Communities (PLCs) are well-targeted and focused. Staff members see PLCs as purposeful. In some schools, this looks like pairing same-subject teachers together or reducing the group size to be more targeted.
- Recurring meetings are reviewed and reduced. Committees and teams change over time, so some schools have found it to be important to continuously review and reduce recurring meetings when they are not needed any more.

Lesson planning: efficient administrative lesson planning practices in schools

- Centralised and shared curriculum to reduce lesson documentation workload.
- All lesson documentation saved in one central location (units, lessons, assessments, etc) with no requirement for it to be uploaded on multiple platforms.
- Not overly prescriptive with lesson templates to allow for differences between subject areas.
- Reduce duplication of documentation.
- Regular lesson documentation review cycles that reduce the need to re-do documentation annually when existing documentation is working well.
- School-wide and leader-supported process for updating lesson documentation when the curriculum changes.

- Review cost-benefit of non-mandatory planning documentation like creating 'I can' statements, detailed rubrics, and any document that is time consuming and difficult to keep updated.

Assessment and data: efficient administrative assessment and data collection practices in schools

- Maintain a rule: "If we don't use the data, we don't do the assessment", (otherwise, it is more of a compliance activity).
- Middle leaders evaluate assessment choices for effectiveness and efficiency.
- Common assessment tasks accompany shared curriculum resources which means administrative workload is shared between teachers instead of every teacher doing this work.
- Use comparative judgement to reduce the need for marking and/or reduce expectations for marking if it is not resulting in useful feedback to students.
- Select assessment data systems that automate as much as possible.
- Designate a leadership role to support teachers in making use of assessment data so that assessments feel more purposeful.
- Fund additional administration support staff to take on the administrative work for exams and assessments, particularly in senior secondary.

Reporting: Administration for semesterly reporting to families

- Continuous reporting of data as assessments are completed (instead of inputting all assessments in the system at the end of the term) – but careful to not add extra administrative workload for progress reporting, instead automating parent access to assessment data. This usually allows families to have more useful data that they can act on throughout the term instead of waiting for end-of-semester reports.
- Automatically generate end-of-semester achievement levels from data entered into data collection platform.
- Minimal or no written comments and use of standard comment banks.
- Use twice yearly parent-teacher meetings in place of detailed comments.
- Eliminate duplication of reporting documentation.
- Dedicated pupil-free time for writing reports.

Administration work for managing student attendance

- Partner with staff, students and parents to emphasise the importance of attendance in every aspect of student-school life.
- Develop a multi-tiered system of support that identifies early warning signs of disengagement in your context and acts on this quickly.
- Agree to and adopt protocols and efficient administrative routines that focus collective effort on a classroom climate focus on student achievement, learning and wellbeing enabled by a safe social environment across the school.
- Consistent and effective follow up processes with clear roles and responsibilities for teachers, ES staff, students, parents.
- Enhanced use of digital systems to:
 - understand and manage student absence data
 - communicate with teachers, and parents.
- Using administrative support to reduce teacher workload.
- Focused roles to better understand and address student attendance issues (e.g. teachers, allied health and education support).

Box 3 Reducing School Workload Toolkits

Both Australian Institute for Teaching and School Leadership (AITSL) and the United Kingdom's (UK) Department for Education have created toolkits for reducing school workload. These toolkits provide practical tips for and school staff about how to evaluate administrative workload and create a plan to reduce it.

AITSL's School Workload Reduction Toolkit was designed as part of a 2020 review to reduce red tape for teachers and school leaders. The associated report is called *Shifting the balance: Increasing the focus on teaching and learning by reducing the burden of compliance and administration*. The toolkit provides everything school staff need to get started on reducing the impact of compliance and administrative tasks on teacher and school leader time. There are 7 topics with instructions and templates to make it easy to adapt and use as needed.

AITSL School Workload Reduction Toolkit: [Reducing red tape - Shifting the balance](#)

The UK Department for Education's recent initiative of a *Reducing School Workload Toolkit* provides a practical tool that could be adapted and applied in Australian schools. It provides tangible, practical and comprehensive guidance and a variety of downloadable tools that help steer schools through the process of reducing time on non-teaching tasks. The toolkit essentially supports school leaders to identify and address workload issues in their school and evaluate the impact of their workload reduction measures. This enables schools to manage their own internal processes for identifying and streamlining school practices and in doing so free up time for teaching and learning.

UK Workload Reduction Toolkit: [Workload reduction toolkit - Improve workload and wellbeing for school staff](#)

Table 4: Steps schools can take to reduce administrative and compliance workload

Steps schools can take to reduce administrative and compliance workload	
Process	Detail
1. Identify and assess administrative and compliance workload issues	<ul style="list-style-type: none"> • Review School Staff Survey 'shielding and buffering' data and consult with school staff. • Prioritise specific workload areas. • Confirm whether the school is doing more work than is required by policy. • Identify any duplication that is unnecessarily adding to workload • Assess the cost-benefit of work: What is the benefit of a particular task (e.g. to student outcomes), and what is the cost in terms of hours worked?
2. Implement efficient administrative practices	<ul style="list-style-type: none"> • Implement efficient administrative practices for meetings, planning, assessment and data, semesterly reporting, managing attendance, and other priority areas. • Create systems and clear roles and responsibilities to streamline the administrative and compliance work. • Stop doing administrative work that is not mandatory and does not meet the cost-benefit test. • Hire additional administration support staff to take on the work. • Adhere to priorities and reduce extraneous work, de-implement where possible.
3. Monitor progress and communicate with staff	<ul style="list-style-type: none"> • Provide regular updates on changes to administrative and compliance workload.

- | | |
|--|--|
| | <ul style="list-style-type: none">• Empower staff to hold each other accountable for reducing administrative and compliance workload.• Review School Staff Survey data to evaluate progress.• Ensure middle leaders in the school are not unintentionally adding to staff administrative workload (and instead are helping decrease the workload). |
|--|--|

Creating measurable and sustainable change

Recommendations

27. Add questions to the School Staff Survey to monitor administrative and compliance:

Recognising the experience and operational expertise of school-based staff, expand the School Staff Survey to gather feedback from all school staff about administration and compliance issues, including feedback on school-based and departmental decisions

28. Consolidate surveys and evaluations into an opt-in model: Reduce the frequency of subject specific survey or request of evaluation input by consolidating approaches to staff feedback in a single opt-in model, similar to the Engage Victoria platform.

The rise in volume and complexity of administrative and compliance activities usually happens gradually and without deliberate planning. The department needs to have measures and processes for ensuring that administrative and compliance workload decreases and does not creep back up over time.

Measuring and evaluating administrative and compliance activities

What gets measured, gets managed. It is important to have simple measures of performance at the system level that can be used by the department to monitor improvements over time. This is important for any cost-benefit analysis as well because it is impossible to evaluate cost-benefit without proper measures.

The 2023 VAGO report into Principal Health and Wellbeing recommended that the department better monitor, evaluate and report on issues related to principal workload. There are, however, issues with measuring workload over time. While available data vary somewhat, in comparisons to other states and territories, Victorian government school principals and teachers say that they work about the same hours per week despite variations between systems.¹⁶¹⁷ It is possible that many school staff, including principals, will work about the same number of hours each week regardless— if one type of work is reduced, another type of work will fill its place. It is therefore more useful for the system to monitor whether the type of work that school staff are doing is the most important and best use of their time, and the most directly related to improving outcomes in teaching, learning and wellbeing of students (while acknowledging that there will always be an inherent level of other work, including administrative and compliance activities, in any job).

The department does not have a consistent, system-level approach to monitoring satisfaction with or quality of department and contracted services to schools. Individual helpdesks, phone lines, and support teams each have their own approaches to gathering data. The Review found that it was difficult to get information about the effectiveness of different supports and programs.

Despite operating a large number of school-staff-facing help desks, service portals and enquiry lines across areas including policy and compliance, HR, recruitment, IT, employee conduct, emergency management, and facilities, most services did not routinely collect satisfaction data in a comparable format across services, nor did the department compare the effectiveness of different services or monitor changes in effectiveness over time. The Principal Advisory Service is one of only a handful of programs currently collecting regular quantitative data on satisfaction and could serve as a model for other business areas.

Data on service quality and satisfaction

In any organisation, in order for the organisation to fulfill its objectives, it is important that employees are satisfied, that the services and supports offered by that organisation to its employees are meeting their needs, and that they are responded to. It helps to have good systems in place to do this. However, the Review found that the department does not have a consistent, system-level approach to monitoring satisfaction with or quality of department and contracted services to its employees, school staff.

¹⁶ Australian Institute of Teaching and School Leadership, Australian Teacher Workforce Data collection, Fill time working hours by state, 2024.

¹⁷ ACU Australian Principal Occupational Health, Safety and Wellbeing Survey data (unpublished).

The Review found that it was difficult to get information about the effectiveness of different supports and programs, and individual helpdesks, phone lines, and support teams each have their own approaches to gathering data. Most services did not routinely collect satisfaction data in a comparable format across services, nor did the department compare the effectiveness of different services or monitor changes in effectiveness over time. The Review found that the Principal Advisory Service is one of only a handful of programs currently collecting regular quantitative data on satisfaction and could serve as a model for other business areas.

Surveys for school staff

One common administration workload frustration from school staff is that there are too many surveys and requests for input. At the same time, school staff feel like a big factor in the growing administration and compliance workload is that department program areas do not engage closely enough with people who work in schools to understand the implementability of various programs and policies.

School staff report receiving a lot of requests to complete surveys from the department, but these are usually specific to individual program or policy teams and not designed or made available within the department in a way that provides oversight of school staff opinions on the department's services. An Assistant Deputy Secretary in Schools and Regional Services approves teams to communicate with schools and request survey data, based on advice from OPSEC.

There are a few systemic surveys that collect feedback – a twice-yearly principal survey, and an annual staff survey.

Staff provide feedback to school leaders via the School Staff Survey, but those questions do not relate to the department or its activities. There is no regular survey for teachers, middle leaders, business managers, or other ES staff to provide feedback to the regions or the central department. Surveys for individual program and policy areas exist but they are not systematically collated across the department or repeated to track performance over time.

Principal survey feedback is used at the system-level to prioritise efforts and track opinions over time. However, principals have mixed feelings about the survey because it is not anonymous.

School staff simultaneously feel like they have limited input into department processes as well feeling over-surveyed with too many feedback requests. This is partially a result of staff not receiving consistent follow-up after they provided feedback, so they are not sure if the feedback is used by the department. It may also be attributed to the confidentiality around processes of government (e.g. Cabinet submissions and Budget proposals) which mean that even when the department is acting on feedback and input, department staff are not able to communicate detail and ongoing decision-making processes.

One example of a process to streamline consultation and feedback efforts is from the Victorian Government. The Victorian Government Public Engagement Framework sets standards, principles and expectations for quality public engagement in Victoria and provides a set of outcomes so that the government can evaluate engagements and focus on continuous improvement. As part of this framework, the Government launched the Engage Victoria consultation platform which aims to streamline feedback. See more about this in Appendix C: Supplementary evidence.

Estimates of administrative and compliance workload

The Review found that complicating any discussion of administrative and compliance workload is the fact that the total administrative and compliance workload is unknown because there are no estimates of what the cumulative workload looks like in schools. The department collects much data from school staff, and conducts many evaluations which collect data on outcomes, but reduction in workload, including administrative workload, is not one of the outcomes typically tracked. There are department initiatives that are reducing administrative and compliance work, but their evaluations focus on measures like '% of schools compliant' as evidence that the initiative is working.

Between 2014 and 2019, the department conducted an annual study of principal work and wellbeing using a detailed survey methodology. This provided some useful evidence about the composition of principal work in

the period, and informed later work by the department to address principal workload and wellbeing issues but was discontinued due to declining response rates.

There are 3 issues with not estimating and tracking administrative workload:

- **There are unaccounted-for costs to the public.** Whilst the costs of a department-administered program can be known, there is no known way to track the costs of program administration in schools.
- **It can be difficult to secure investment in enabling systems and back-office services.** The Review heard many times that it was difficult to make a strong business case for resourcing additional staff to reduce the administrative burden on school staff.
- **A cost-benefit analysis for new requirements for schools cannot be conducted.** The department aims to increase compliance across all schools, but adding new requirements can be costly, in terms of hours and dollars. Without the ability to measure and track these costs in schools, new requirements are added to the work of school staff without the ability to do a proper cost-benefit analysis.

Below, the Review recommends that the department create some simple estimates of administrative and compliance costs in schools that can be tracked over time. The department could use these estimates to inform decisions about new initiatives.

To be effective and sustainable, any future methodology for estimating and tracking administrative workload must avoid the issues inherent in previous attempts. To this end it must:

- **Employ a robust, consistent methodology** – focus must be on estimating time use rather than assessing compliance rates or other outcomes, which can be met through program evaluations. It should consider whether the workload may vary for school to school, for example, based on school size or type, or student characteristics.
- **Be prepared for all areas of work in schools** – this should include work arising from external obligations, even where the department has limited capacity to influence the requirement.
- **Be relatively quick to prepare for an individual process** – this makes it less likely that the process will be avoided or misunderstood.
- **Not require widespread administrative work for school staff** – estimates should be prepared on a desktop basis by department staff and sense checked by an appropriate reference group. Very significant or uncertain estimates should be validated through low-impact observations of school staff (e.g. time and motion studies).

Establish a governance framework for administrative workload reduction

The Review found that it is important to establish an organisation-wide mechanism to continuously evaluate new administrative and compliance requirements. The department needs to establish strong, consistent governance arrangements for ongoing monitoring and reduction of administrative workload, to ensure that this issue remains a continuing focus alongside other priorities. New arrangements should:

- apply to all areas of the department's operations which impact school staff
- consider the impacts of externally driven requirements (even where opportunities to influence these are more limited)
- bring a range of perspectives to monitoring and decision-making
- promote collective accountability for monitoring and reducing administrative workload.

OPSEC's current role in the continuous administration reduction process

The OPSEC division conducts a buffering function in the department. OPSEC publishes operational policy for schools on PAL, develops template policies for schools to amend to their local contexts as required, shapes the sequencing of communication to schools, supports scheduling of audit and compliance activities and provides advice to other program areas on whether policy and program requirements for school staff are achievable, including considering the implications for school staff workloads. OPSEC supports the department to reduce unnecessary burden, supporting clear and useful communications, and providing clarity on policy and compliance.

OPSEC has a particular focus on reducing administrative and compliance burden for schools, improving awareness, understanding and compliance with operational, and streamlining workload implications, volume and timing of communications to schools. It also plays an important role managing the department's 'review body' functions under the MOU with the VRQA, the school sector regulator.

School impact assessment

Around 2020, OPSEC developed a School Impact Assessment, a detailed form for department policy and program areas to fill out and serve as a prompt to consider ways to reduce administrative and compliance workload for school staff when new initiatives are being designed. For a short time after COVID, the School Impact Assessment tool was required to be completed for papers going to a former committee (the Government School Reform Committee). However, it is not currently mandated. At the time of this Review, there is limited use of this tool across the department.

The School Impact Assessment tool is highly detailed, and to ensure consistency and accuracy of estimates provided requires a lot of support from the OPSEC team, who have a focus on, and understanding of, how changes will be implemented in schools. Program areas using the tool without this support are at risk of concluding that their initiative has a low impact and will not result in meaningful reductions to school staff workload.

However, there have been positive results from using the School Impact Assessment. In 2022, OPSEC assisted IMTD to use the School Impact Assessment for a new requirement to review product reports and complete actions to make third party software safe for use in schools.

IMTD initially assessed the program as having a low impact on school operations. After working closely with OPSEC to consider the impact on school staff, the program was re-assessed as high impact, and the following changes were made to the program design:

- the project shifted away from a full release to all schools to a pilot with 20 schools, to better understand the impact on school staff before a broader roll out
- supports were proposed to be put in place via a help desk for school staff transitioning to new software
- flexibility was increased, with more time provided to schools who would need to transition
- simplification of the actions required for school staff to safely use a product instead of complex and onerous requirements.

The process took a considerable amount of time and effort from both IMTD and OPSEC, but it had a positive end result for school staff. This intensive review process is useful for larger initiatives but will not work so well for smaller program and policy changes where such investment of effort is intensive.

Implementation actions for consideration – measurement and evaluation

- Measure the workload impact of administrative and compliance requirements by:
 - adding a measure of administration and compliance workload to the School Staff Survey
 - developing a School Engagement Framework to guide the development of consistent, systemwide feedback mechanisms on administrative and compliance issues
 - requiring program evaluations to explicitly consider administrative and compliance workload impacts.
- Track the stock and flow of administration and compliance requirements by:
 - developing a light-touch standard model to estimate the hours of school staff administrative workload generated by any process, regardless of source
 - requiring preparation of an estimate of hours of additional workload created for all changes and new initiatives
 - reporting on trends to senior leadership.
- Continuously improve processes by:
 - setting annual targets for reduction in administration and compliance hours
 - establishing a regular process for department teams to nominate process improvements that could be adopted to assist in meeting the targets
 - standardising customer service data measures across the department to enable comparison across all key systems and functions and collecting and reporting to senior leadership
 - establishing a team to conduct rolling process improvement reviews and report on findings and recommended improvements to senior leadership.
- Improve engagement with school staff on administrative and compliance workload issues by:
 - providing an online platform (similar to Engage Victoria) where school staff can opt in to providing feedback on the administrative impacts of various initiatives, reducing the need for multiple feedback requests
 - regularly reporting back to school staff on changes made in response to their feedback.
- Minimise the development of new issues by:
 - instituting a new stage gate process for changes to processes, systems and requirements designed to minimise and prevent additional administrative burden, ensuring that the process is mandatory not advisory, and applies to all parts of the department
 - increasing the transition and phase-in time for changes wherever possible
 - increasing engagement with school staff, unions and peak bodies in process development at a point where meaningful changes can still be made before processes are rolled out.

Considerations for external regulators and Victorian Government bodies

As discussed in *Key findings*, the significant drivers of administrative and compliance activities in government schools are often laws, policies, or regulation from sources external to the department. To have sustainable improvement in the efficiency of administrative and compliance work in schools requires a whole-of-government approach to making sure requirements are implementable and not overly onerous for school staff.

This section provides an overview of 2 external drivers of administration and compliance workload in schools. This section does not make recommendations but does include considerations for the government and regulators.

Government regulation

This report uses the terms ‘regulatory environment’ or just ‘regulation’, in broad terms to describe the legally binding requirements created by governments through legislation, regulations, or other instruments, such as codes, orders, or directions, issued by Ministers, regulators, courts and quasi-judicial bodies. Regulation involves creating and enforcing laws, rules, and standards across various sectors (e.g. healthcare, business, environment, education) to guide behaviour, and ensure safety, fairness, and adherence to legal standards.

There are direct and indirect sources of regulation for schools, which may include Ministerial orders, laws, court decisions, audits, reviews and inquiries, and regulator decisions.

These are direct and indirect sources of regulation for schools:

- Ministerial orders
- Laws
- Court decisions
- Audits, reviews and inquiries.

Regulation is a significant driver of administrative and compliance activities in schools. In contrast with non-government schools, government schools are limited in their ability to raise additional funds from fees or donations to cover the costs of meeting new requirements and are reliant on government for funding. Increased regulation is affecting almost all industries, not just education. It may be particularly challenging for schools to absorb the additional work required to comply with new requirements compared with other public sector organisations because schools are mostly quite small in workforce terms, and many do not have the professionalised corporate services staff found in other organisations.

There are – appropriately – significant regulatory controls to operating a school in Victoria. The Review does not question the good intent of new regulatory requirements, which are often created in response to adverse events in schools or other workplaces. There is public benefit in swiftly responding to these incidents and adopting systems to prevent future harm. However, new regulatory requirements (and the expectations from regulators and oversight bodies as to how they should be met) are often added without an appreciation for how they interact with existing requirements and the level of effort, and funding, required to implement them at the school level. The school system has seen additional layers of accretion without corresponding reduction or additional resources to support compliance. Effective implementation of new requirements generally requires hands-on support, and sometimes an on-the-ground presence in schools, but resourcing for this has not been consistently made available.

The Review found that the purpose of regulation was justified in many cases, but the exact design of regulation can make it more (or less) implementable in government schools. Every additional compliance minute and dollar constitutes a trade-off in schools; if school staff are spending more time on compliance, they are often spending less time on tasks directly related to teaching and learning. This trade-off may be worth it in many cases, but the main finding from this Review is that this cost-benefit analysis is rarely conducted, or if it is, it is not well communicated to school staff. A thorough cost-benefit analysis of regulatory activity would avoid the introduction of inefficient or ineffective compliance activity.

Future directions for regulation in schools

The increased regulatory environment affecting schools is not unique. There are already goals for reducing regulatory burden in the Victoria Government, for example, the Red Tape Reduction program and the VAGO Reducing the Burden of Red Tape report from 2016. As at the time of writing, the VRQA is conducting an internal review of its current approach to school regulation. The purpose of the internal review is to ensure that the VRQA's approach to school regulation, (in particular, its assessment of schools' compliance with the minimum standards and requirements for registration), aligns with a risk-based, proportionate approach to regulation and is consistent with the VRQA Regulatory Approach Statement. These efforts will likely have a positive effect on school staff administrative and compliance workload.

The department has also done significant work to reduce the compliance burden on schools. Successful examples of this include the PAL and the School Policy Templates Portal which provide schools with clarity about what they are required to do to comply with regulation and policy as well as providing templates to reduce workload and ensure that school staff do not have to individually write policies from scratch.

If the regulatory environment keeps expanding, then the department will need significant additional resourcing to create supports and services for school staff to manage the increased requirements. However, regulators and lawmakers have an opportunity to improve school regulation to reduce costs and improve efficiency. This would require regular reviews, assessment of costs and benefits, and explicit goals of red tape reduction. This would

make regulation more efficient, but it would also make it feel more purposeful for school staff, thereby increasing trust in the regulatory environment.

Box 4: Considerations for reducing administrative workload driven by regulation

The Review is not making any recommendations for regulators and lawmakers and instead provides considerations to improve the impact of regulation on schools.

- Design regulation in consultation with school staff to assess “implementability” of the work in the school context.
- Establish a process to regularly assess the cumulative impact of regulation with goals for red tape reduction.
- In Regulatory Impact Statements, where the burden on schools is significant or where schools are a significant focus of the regulation, explicitly estimate the cost (in terms of dollars or work hours) of new regulation on schools to improve cost-benefit analysis.

See Appendix E: Legal, regulatory, and policy context for administration and compliance for more details.

Accountability and data collection requirements

The Review found that accountability and data collection have expanded over time and would benefit from being consolidated and streamlined. Accountability for the use of public resources is a critical subset of government functions to ensure public money is used both responsibly and transparently. To achieve this, there are requirements for the department and school staff to report on how money is spent as well as to report on outcomes. Requirements for accountability may arise from Victorian laws and supporting regulations and policies, or Commonwealth laws and entities, including the Commonwealth Department of Education.

A data collection requirement may sometimes be linked to accountability or may have another purpose, such as providing evidence, allocating funding, or supporting research. An example of a data collection requirement is the national requirement to provide Nationally Consistent Collection of Data.

All accountability and data collection requirements are important on their own but added together they have grown to be a significant source of administrative and compliance workload. Requirements tend to involve different portals and various data collection templates that can be overwhelming for schools.

Box 5: Considerations for reducing the administrative workload of accountability requirements for school staff

The Review is not making any recommendations for external organisations about accountability and data collection, and instead provides the following consideration to improve the impact on schools:

All government entities work with the department to identify accountability reporting requirements that are affecting school staff that can be reduced, simplified, or eliminated. Identify options to exempt or reduce requirements for school staff from Victorian Government requirements that apply to all public service (for example, the Travel Application process as described in camp and excursion paperwork).