

# Organisational Review of the Victorian Curriculum and Assessment Authority



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## Foreword from the Independent Reviewer

In December 2024, I was engaged to undertake a 2-part review of the Victorian Curriculum and Assessment Authority (VCAA). The first part was to undertake an examination of the reasons for the problems that occurred in the preparation of the 2024 Victorian Certificate of Education (VCE) examinations and to make recommendations designed to minimise the likelihood of similar problems occurring in the future. The report of the first part of the Review, released by the Minister for Education the Hon. Ben Carroll in April 2025, made recommendations relating to the role and composition of the VCAA Board, improvements to the processes for examination preparation, and the need for crisis planning and back-up examinations.

This second part of this Review is an examination of the VCAA's organisational structure, management, culture, operating environment, capabilities and business processes.

While the first report was written with the general community as the primary audience, this second report should be read as a manual for improvements in the way the VCAA operates. Consequently, it details problems and suggested solutions, which will be primarily of interest to the VCAA and the Department of Education, school communities and key stakeholders.

As a 'root-and-branch' Review, the first question to be asked is whether responsibility for the VCAA's 2 core functions, curriculum design and examination development and assessment should continue to be done, either singly or together, by a statutory authority or by the Department of Education?

In answering this question, we examined arrangements across the various Australian jurisdictions, New Zealand and Singapore.

While there are variations in relation to the responsibility for F–10 curricula, all Australian jurisdictions have senior secondary curricula and assessment prepared by a body other than their jurisdiction's Department of Education.

For the reasons discussed in this report, we have concluded that to bring responsibility for curriculum and examination development and assessment into the Department of Education would create risks to the delivery of its core functions without material benefits.

In short, the interests of Victoria's students and their families would best be served by reforming the VCAA to operate as effectively and efficiently as possible rather than shifting the VCAA's responsibilities to the Department of Education.

Achieving those objectives will be neither easy nor quick. The VCAA requires renewal in almost all areas of its operations. This has begun with the recent appointment of a new Chief Executive Officer (CEO) and a reconstituted Board. It has suffered from lack of leadership, management and governance failures, a poor organisational culture, inefficient business processes and difficult relationships with the Department of Education and external stakeholders. It also lacks a sustainable budget and the contemporary technology necessary for the efficient and effective performance of its roles and responsibilities.

This report makes recommendations to address each of these challenges.

These problems have been widely recognised by VCAA staff, and their commitment to their work despite these challenges is to be admired.

In preparing this report, we conducted extensive discussions and workshops with staff in the VCAA and the Department of Education. We also met with key stakeholder groups and received 180 written submissions from current and former VCAA staff, stakeholder organisations, teachers and students. While many raised issues that need to be addressed, many also made suggestions of improvements that could be made.

The overwhelming sentiment was one of sadness and disappointment that the VCAA was not functioning at the level they would like, and a willingness to assist in making it operate more efficiently and effectively in the future.

That sentiment underpins this report.

I would like to thank all those who have contributed. I would also particularly like to thank the team from KordaMentha who have provided me with support of the highest quality and done so with both good humour and commitment.

I commend this report to the Secretary of the Department of Education.

A handwritten signature in black ink, appearing to read 'Y. Blacher', with a stylized, cursive script.

**Yehudi Blacher**

Independent Reviewer

VCAA Root-and-Branch Review

18 September 2025

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## Executive summary

### The Minister for Education commissioned this ‘root-and-branch’ Review of the Victorian Curriculum and Assessment Authority

The VCAA is a statutory authority tasked with designing and administering high quality curricula and assessments for more than one million Victorian students across 2,300 schools. Every year, the VCAA develops and delivers more than 100 VCE examinations to more than 70,000 students across Victoria and internationally as the final milestone of their secondary school education.

This report is the second under the Terms of Reference established by the Secretary (at the request of the Minister for Education) for a full ‘root-and-branch’ Review of the VCAA. It examines whether all aspects of the Authority are working in the best way possible to deliver on its functions and statutory responsibilities. It also identifies reforms that are intended to ensure Victoria has an Authority that is fully fit for purpose and has the confidence of students, schools and the Victorian community.

### We consulted extensively to undertake this Review

This Review systematically examined the functions and activities of the VCAA to make our findings and recommendations. We considered the organisation’s structure, operations, technology, governance, culture and capability.

We reviewed many of the VCAA’s policies, practices, strategies, data and records. We spoke with more than 75 staff, executive and Board members, held multiple workshops with staff and executives from across the business and met with representative bodies, unions, subject matter associations and representatives of the Department of Education.

Beyond this, we met with representatives from educational authorities in New South Wales, Queensland, South Australia, New Zealand and Singapore to understand the practices in those jurisdictions.

### We found the VCAA has not been well equipped to carry out its responsibilities

The VCAA lacks many of the foundational structures, governance, processes, technology and capabilities that are commonplace in modern organisations. These deficiencies have manifested particularly over the past 5 years.

Basic organisational disciplines such as budgeting, human resource management, project planning and management, risk management and reporting have been left to atrophy.

This has led to some very poor workplace behaviours being tolerated in the interests of the ‘mission’. There is strong adherence to ‘how we have always done things’ and yet little documentation of those processes or induction of new staff into the organisation’s processes, tools and techniques. This has meant until recently there has been little organisational regard for the cost (either financially, or in the discretionary effort of its people) of the activities it is undertaking.

In recent years, many long-serving staff members have retired or otherwise left. Those departures revealed the fragility of the VCAA's processes. The culture, systems and controls that should ensure continuity when replacing highly skilled staff have been absent.

Consequently, mistakes were made that might otherwise have been avoidable.

In our first report, we outlined how compounding delays in the production of examinations led to the suggested use of an unapproved process by a relatively new casual staff member to catch up on the production of cover sheets. That change was adopted without management approval and, as a result, there was an unauthorised disclosure of sensitive examination materials.

This was a microcosm of the VCAA's challenges. The focus was always on what needed to be done, with little questioning of how or why. This balance needs to change, or the risk of further challenges will continue.

## We saw green shoots while undertaking this Review

Encouragingly, the VCAA has not waited for the results of this Review before beginning to reform its operations. Under both the Interim CEO and newly appointed CEO – and with the guidance of the Independent Monitor – improvements have been made to the development of the 2025 VCE examinations. Key capabilities, such as in the finance function, are being strengthened. New disciplines – such as formal, written briefings and the use of workflow tools like Asana – have been introduced and are being gradually adopted by staff, accompanied by training and support.

These steps are all encouraging and will build momentum to implement the essential reforms that lie ahead.

## We identified 11 further reforms to ensure Victoria has an Authority that is fully fit for purpose

Given the VCAA's organisational disciplines are so immature, our recommendations are wide ranging and touch on nearly all elements of the VCAA. An organisation-wide uplift in capability is needed for the VCAA to meet the expectations of the Victorian community.

This Review makes 11 primary recommendations to ensure the VCAA is better able to deliver on its mandate.

1. Retain the VCAA as a Statutory Authority.
2. Strengthen governance focus of the Board on key reforms and refreshed oversight committees.
3. Clarify the VCAA's relationship with the Department of Education.
4. Establish a sustainable VCAA budget.
5. Implement structural changes to strengthen accountability and refocus the organisation on critical capability uplifts.
6. Reset organisational leadership, capabilities and culture, commencing with a progressive spill-and-fill of senior roles.

7. Critically review and redesign operating policies and processes.
8. Continue strengthening examination processes end to end with a focus on stronger process management in the early stages and enhanced integrity controls.
9. Establish a clear technology roadmap with priority focusing on the most critical operational risks.
10. Reset external stakeholder relationships and strengthen the focus on external 'customer' needs.
11. Maintain an Independent Monitor for a further 12 months or until the Minister is satisfied that the VCAA has the systems and processes to undertake its functions effectively.

Ten of these recommendations have several sub-recommendations to provide specific guidance to the VCAA and Department of Education on how they should be implemented. This report is structured against each of these recommendations.

## Implementing these reforms will not be straightforward because the VCAA needs to continue delivering its essential functions in parallel

The VCAA has been extensively reviewed in recent years, yet problems persist. In some cases, this is because recommendations made in those reviews have been set aside or deprioritised due to urgent delivery tasks. This cannot be allowed to continue.

Working together, the CEO, Board, Department of Education, and the Independent Monitor need to ensure there is sufficient focus, resourcing, and accountability for the implementation of our recommendations. These changes will need to be made while the core services provided by the VCAA continue uninterrupted.

Accordingly, we believe that the reforms proposed in this Review will take up to 3 years to deliver.

# Introduction

## Organisational overview

### Functions and purpose of the VCAA

The VCAA is a statutory authority operating under the *Education Training and Reform Act 2006* (ETRA), with responsibility for developing high-quality curricula and examination development and assessment for Victorian students. It is primarily accountable to the Minister for Education. The VCAA is also a registered Senior Secondary Awarding Body with the Victorian Registration and Qualifications Authority (VRQA) and is responsible for the awarding of its courses to VRQA-registered schools.

The VCAA has remit over the policy, design and reform of curriculum and assessment across Early Childhood Education, Foundation – 10 (F–10), the VCE (including Vocational Education and Training (VET) courses, and the VCE Vocational Major (VM)), and Victorian Pathways Certificate (VPC). The work of the VCAA reaches more than one million students, including more than 57,000 students completing the VCE and VCE Vocational Major.

The major activities of the VCAA are:

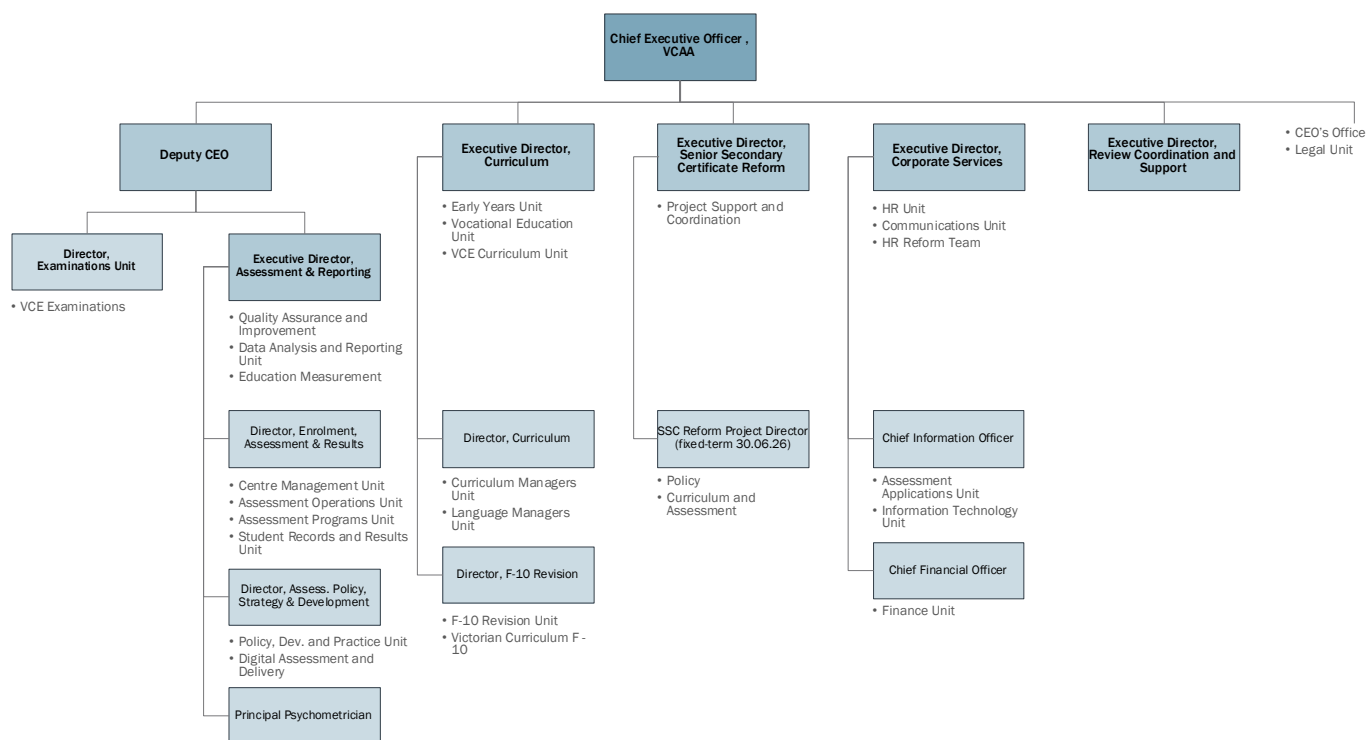
- developing curricula for VCE, VCE VM and VPC
- adopting and adapting F–10 curricula from the Australian Curriculum into the Victorian framework and context
- developing the Victorian Early Years Learning and Development Framework (VEYLDF)
- developing examinations for the VCE and undertaking the assessment process to deliver study scores
- delivering the Season of Excellence to showcase a range of senior secondary student work
- validating that school-based assessments and tasks conform to required standards through undertaking subject audits
- delivering the National Assessment Program – Literacy and Numeracy (NAPLAN) in Victoria on behalf of the Australian Curriculum, Assessment and Reporting Authority (ACARA)
- maintaining the Victorian Student Register, which identifies all Victorian students through a Victorian Student Number.

### Organisational structure and governance

The VCAA is accountable to the Minister for Education through its Board. The ETRA specifies that the VCAA's CEO is accountable to the Board for policy and operational matters and to the Secretary for budgetary, personnel and other administrative matters.

The VCAA is operationally structured into 4 divisions responsible for curriculum, assessments, the senior secondary reform program and corporate functions. In line with the phase 1 recommendations of this Review, the examinations unit and assessment and reporting division now report to a new Deputy CEO position, providing a single point of accountability for examinations and assessment.

### Overview of VCAA organisational structure (30 June 2025)



### Recent history of the organisation

As detailed in the Phase 1 report of this Review, the VCAA has faced successive challenges and significant organisational instability over the past 5 years. Sweeping changes to vocational education were implemented in 2020. At the same time, the COVID-19 pandemic forced a radical change in long-held ways of operating.

In 2022, the VCAA came under scrutiny as critical errors were identified in several examinations including Mathematics, prompting the organisation to initiate an external review. Similar errors in Mathematics and Chemistry were identified in 2023, prompting the Department of Education to commission a further review. In 2024, an error in the publication of examination cover pages resulted in sensitive materials being disclosed for 65 of 116 VCE examinations. As a result of these errors, public trust in the VCAA has significantly eroded.

This period has also been marked by significant organisational turbulence. The organisation has seen 7 substantive and acting CEOs over the past 5 years, only one of whom oversaw more than one full examination cycle. The destabilising effect of changes in senior management and successive publicly scrutinised issues with examination processes during that period have accelerated a deterioration of morale and acceptable behaviour within parts of the VCAA.

In 2025, the Secretary of the Department of Education appointed an Independent Monitor, Ms Margaret Crawford PSM, to quality assure this year's examination process and at the same time commissioned this 'root-and-branch' Review of the VCAA.

The recommendations made in this report have been developed in consultation with the Independent Monitor.

## Key recommendations

### Recommendation 1 – Retain the VCAA as a statutory authority

#### 1.1. The VCAA to continue as a statutory authority

Successive issues in examination delivery and the governance challenges identified in the Phase 1 report raised the question of whether the statutory authority model was most appropriate for some, or all, of the functions of the VCAA.

The VCAA's 2 core functions, curriculum design and examination development and assessments, require it to operate effectively as a two-speed business. Some jurisdictions reflect this dichotomy by separating the slower, more consultation-based curriculum-setting process and the highly operational, systematic production process of examination development and delivery into different entities.

Consequently, this Review contemplated numerous different models available for the delivery of the VCAA's core responsibilities. The options considered, and their principal advantages and drawbacks, were as follows.

- Option 1: Wind up the VCAA as a statutory authority and move both the curriculum and examination development and assessment functions into the Department of Education. This could provide a higher level of governance control over the VCAA's functions and increase the likelihood of these functions being allocated the staffing and technology needed for effective delivery. However, execution of a highly time-sensitive examination development and delivery process requires specialist skills and an organisational culture very different to the core capabilities of a public service department with its expertise in policy setting, regulation and school support. Many highly skilled staff would likely leave the organisation. In addition, it would also likely destabilise the relationship between the Department of Education and the non-government sector, which predominantly relies on VCAA curricula.
- Option 2: Separate the curriculum function and shift it into the Department of Education like South Australia for F–10, and New Zealand and Singapore for all curricula. This split would refocus the VCAA on excellence in its operational examination development and delivery process. However, as in the first option, such separation would also destabilise the relationships between the Department of Education and the non-government sector for no apparent gain.
- Option 3: Retain the VCAA as a statutory authority with its current core functions and undertake a range of governance, organisational structure and operational and cultural reforms to improve its efficiency and effectiveness.

- Option 4: We also considered the possibility of merging the VCAA with another statutory authority in the Education portfolio but concluded that this could deflect the VCAA from focusing on the effective reform and delivery of its core functions.

On balance, this Review determined that the existing statutory arrangements should be retained.

## 1.2. Clarify key short- and medium-term priorities for the Board consistent with the *Education and Training Reform Act 2006*

In retaining the existing statutory arrangements, it is important to acknowledge that, in recent years, the Board has not effectively overseen the functions of the organisation. The measures taken to reconstitute the Board consequent to our first report are initial steps. As the governance transitions from an interim to a fully reconstituted Board, it is essential that the Board take on the following key roles.

- Development and accountability for a clearly integrated organisational strategy and business plan.
- Approval of operational priorities and support for the CEO's engagement with the Secretary in relation to budgetary and personnel matters.
- Ensuring that it has clear line of sight on the annual budget and resource allocation, and that these are appropriately monitored by the whole Board.
- Ensuring that the VCAA has a robust risk assessment and reporting system in place and be active in assuring itself that risks are effectively captured, monitored and managed.
- Assuring itself that Victorian Public Service values and workplace policies are adhered to.
- Being publicly visible in addressing, and taking accountability for, challenges faced by the VCAA.

## Recommendation 2 – Strengthen governance focus of the Board on key reforms and refreshed oversight committees

### 2.1. Strengthen the VCAA Board's governance role with a focus on overseeing necessary reforms

The Phase 1 report articulated critical deficits in the skills that the Board demonstrated in the lead up to, and management of, the issues faced by the VCAA in 2024. That report recommended that, in addition to education experience, critical skills required in the future Board include risk and project management, change management, financial management, cybersecurity and oversight of complex, time-sensitive operations.

Accordingly, we recommend that these capabilities should be formally enshrined in a skills matrix maintained by the Board's secretariat.

### 2.2. Issue a Ministerial statement of expectations to the Board, reviewed every 2 years

Board engagement in recent years with the Minister has been insufficient. Consequently, the Government's priority to ensure error-free preparation of examinations was not at the forefront of Board decision-making in 2024. To strengthen the VCAA's governance and facilitate more consistent engagement between the Minister, Board and Secretary, it is recommended that the Minister for Education issue the VCAA Board with a Ministerial statement of expectations to be reviewed every 2 years.

The purpose of a Ministerial statement is to convey the priorities that the government expects to be delivered through the VCAA's business plans and ensure that the Board is consistently held to account for delivering them. Over the next 2 to 3 years, the Minister should establish clear milestones and timelines expected of the VCAA as it implements much-needed reforms.

Importantly, the statement of expectations should facilitate necessary dialogue between the Minister, the Department of Education and the VCAA Board. There will inevitably be intersections between the Board advising the Minister in line with its governance accountabilities, and the Secretary in making recommendations in line with the Department of Education's budgetary and personnel accountabilities. Facilitating routine dialogue between the Minister, Board and Secretary is the most practical approach to managing these intersections.

### 2.3. Reset Board governance committees with clear reporting requirements and oversight accountabilities

To facilitate efficient, focused Board oversight and input into the critical functions of the VCAA, this Review recommends that Board governance committees are reset with a charter that sets out clear expectations for each committee's responsibilities and accountability to the full Board.

This charter should outline the expected roles of VCAA executives supporting the committees and well-defined parameters for the reporting to the committees. It should also specify how reporting aggregates from committees to the full Board, creating clear line of sight for the Board on matters including operational performance, financial health, people matters and transformation. These should serve to support and enable accountability of the Board to the Minister, providing assurance on all material aspects of the VCAA's work.

The future committee structure should include:

- An Audit and Risk committee responsible for the review of organisational financial and other risks at least quarterly, including clarity on sources of budget allocations, performance against budget at a divisional level with commentary about notable variances, and up-to-date forecasting on a rolling annual basis. Executive attendance at the Audit and Risk committee should include the Chief Financial Officer or the executive overseeing the finance function. An organisational risk register approved by the Board should be reviewed at every Audit and Risk Committee meeting and 'red' status items escalated to the next full Board.
- An operationally focused committee, which tracks key operational metrics identified as risks or material variances. This committee could consolidate the current Senior Secondary Curriculum and Assessment, Senior Secondary Reform and Early Years – 10 committees. Operational metrics should include the status of the examination delivery timelines, the status of individual examinations not meeting delivery timelines, curriculum review timelines and the status of school-based assessment audits. The committee should also consider external stakeholder metrics, such as volume of enquiries received and average time to respond. This committee should, at least biannually, also examine broader operational metrics such as Victorian Student Number entries/changes and Special Provisions requests, acceptance rates and time to process. The executive responsible for overseeing examinations should be a standing member of the committee. This committee should also be responsible for overseeing the timely adoption of relevant technology and operational innovations including, but not limited to, consideration of the adoption of Artificial Intelligence (AI) into examination development and assessment.
- A People and Culture committee, which should consider organisation-wide people matters with quarterly reports on key areas of staff turnover, routine people survey results, relevant diversity metrics and the volume of people complaints. The objective will be to have data-based discussions with the CEO about the wellbeing of staff and the status of cultural transformation.
- The Board should also establish an Advisory committee comprising membership from across the education sector, with current or recent teaching experience, to provide advice on the impact of VCAA policies and practices on schools across the state.

To underpin the renewal of the VCAA, the Board should prepare a revised organisational strategy and routinely monitor the progress of overall organisational transformation. It is also recommended that the Board Chair regularly consults with critical stakeholders to understand the quality of engagement with the VCAA.

## Recommendation 3 – Clarify the VCAA’s relationship with the Department of Education

### 3.1. Establish a set of protocols to make clear the VCAA’s accountabilities to the Secretary of the Department of Education

While undertaking this Review, a consistent issue raised by VCAA staff and some stakeholders was the view that the authority was independent from the Department of Education. This perception of independence is a misunderstanding of the VCAA’s role as a statutory authority. Unfortunately, it has had a significant impact on the relationship between the VCAA and the Department of Education.

Section 13A of the *Public Administration Act 2004* requires the Secretary of the Department of Education to advise the Minister on matters relating to portfolio statutory agencies. In addition, the ETRA specifies that the VCAA CEO is accountable to the Board for policy and operational matters, and to the Secretary for budgetary, personnel and other administrative matters. Finally, both the VCAA and the Department of Education are public service agencies accountable to a single ‘shareholder’ – the Minister for Education. In practice, the linkages between the effective delivery of operational matters and managing within a budget are inextricably intertwined and the failure to properly recognise this in the name of a misplaced concept of ‘independence’ has contributed to many of the problems facing the VCAA.

To address this issue, there is a need to strengthen the relationship between the Department of Education and the VCAA. We recommend that this takes the form of a set of protocols or similar framework covering the following matters:

- setting out a mutual intent to communicate, coordinate, collaborate and work together on areas of joint policy or operational priority
- outlining areas of converging policy or operational decision-making and clarifying roles and responsibilities in the respective performance of functions and exercise of powers
- providing appropriate information sharing between the 2 organisations, having regard to necessary privacy provisions
- outlining key principles and behaviours to govern the relationship
- outlining areas of departmental support to the VCAA, leveraging the department’s scale and more advanced capability in areas such as financial management, procurement, risk management and technology.

This memorandum should be periodically reviewed to ensure it serves its purpose of promoting a more collaborative relationship between the 2 organisations. In addition, the CEO of the VCAA should continue attending the department’s executive meetings as appropriate and the Secretary of the Department of Education should – while the VCAA’s transformation program is being established – attend VCAA Board meetings in person rather than send a delegate.

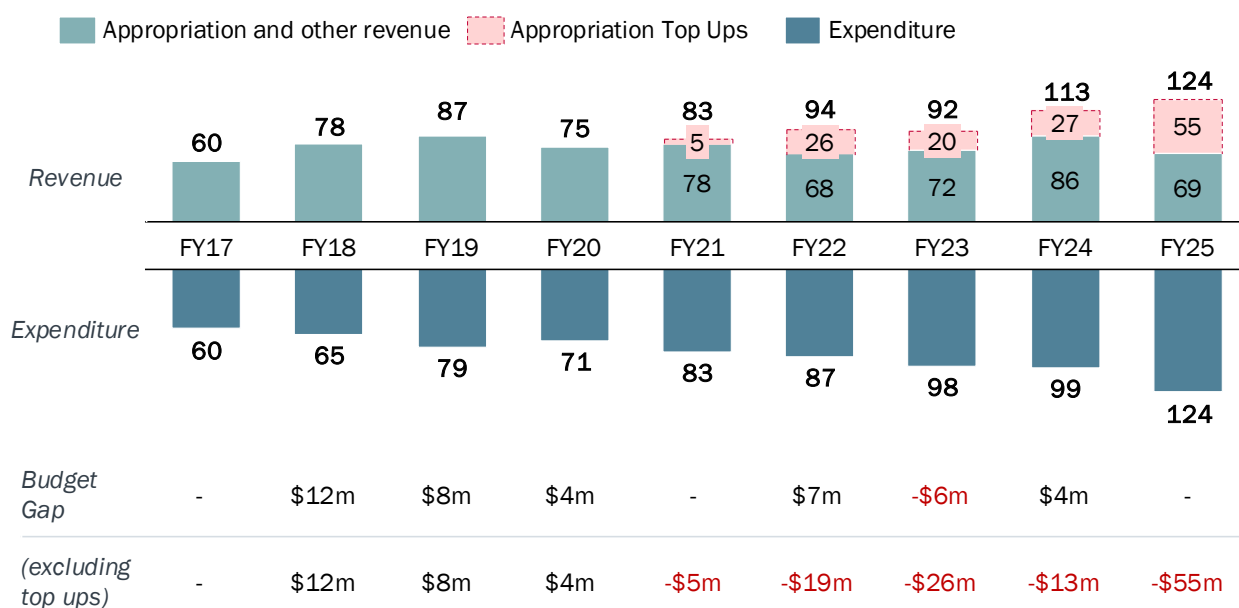
## Recommendation 4 – Establish a sustainable VCAA budget

The VCAA has had an immature financial management capability, little visibility of its budget, few expenditure controls and an undeveloped fact base to support financial decision-making. Consequently, it has been very challenging for it – and for this Review – to determine an ‘efficient’ level of resourcing for the organisation. The VCAA has acknowledged these deficiencies, and management is actively seeking to urgently remedy them.

Notwithstanding these data limitations, it is clear that the VCAA is currently operating a structural deficit and has been doing so for a number of years. The VCAA’s base funding (appropriation from Government) was last comprehensively reviewed in the 2017–18 financial year and has not materially changed since then, despite significant policy and workload changes. A combination of new initiatives, additional activities and underlying inflation has led the VCAA’s costs to significantly outstrip its base appropriation, requiring it to receive ‘top up’ funding from the Department of Education of between \$5 to \$55 million in the 2021–22 to 2024–25 financial years.

### VCAA Revenue and Expenditure by category

\$m FY17-25; actual budgets, excludes unspent project balances



There appears to have been a strong perception by both the Board and management team that the VCAA’s single responsibility was to deliver on-time, high-quality examinations. It is apparent that there have been no genuine attempts to adjust expenditure to meet the base funding, notably because of the practice that the Department of Education would top up the budget when needed.

This lack of control over the VCAA’s finances is seen in material growth in the organisation’s controllable cost base. The VCAA has added 100 direct Victorian Public Service (VPS) employees between the 2017–18 and 2023–24 financial years and more than 1,500 additional sessional (casual) employees. This growth in part reflects additional projects it was tasked to complete (such as the Digital Assessment Library) and the greater complexity introduced by the COVID-19 pandemic. However, it also reflects an organisation that has not critically assessed whether its activities align to its mission and whether its method of delivery is as efficient as it could be.

In our Review, we saw multiple examples of manual and inefficient processes. Technology was used sparingly, or not at all, and considerable discretion was devolved to junior employees to determine how their work would be undertaken and to what quality level. This suggests a significant opportunity to redesign processes, structures, employee skills and organisational priorities to better deliver within the available funding envelope. Resolving these embedded inefficiencies may require short-term investment.

The total appropriation in the 2024–25 financial year of \$124 million (which included top-ups of \$55 million) should, overall, be sufficient to meet the VCAA's needs, excluding necessary capital investment in new technology.

In short, our assessment is that the VCAA's challenge going forward is to better direct its available funding to deliver its core functions more efficiently and effectively.

The following sub-recommendations outline the crucial steps the VCAA should take to place it on a more sustainable financial footing.

#### 4.1. Establish a robust evidence base for the organisation's costs

The most recent funding model review of the VCAA was conducted in 2018. Consequently, the organisation has a poor understanding of the key drivers of its cost base. It does not, for instance, have a clear view of the cost of preparing each examination or the expense that would be incurred if there was an issue that necessitated a rewrite of an examination.

Resource allocations are not systematically adjusted in response to demand drivers (for instance, between a year of significant curriculum review and a year without one) nor is it clear what the process is, or which individual or work group is responsible to make such a decision. The current practice is that budgets are constructed each year with individual functions projecting their expenditure from the prior year without clear challenge or any deep understanding of changing demands.

In some areas (and as best practice), this might entail construction of an activity-based costing model. This would give visibility into how costs would change in response to different drivers of demand, such as the cost of introducing a new study design or rewriting an examination at later stages of the drafting process.

Notably, the cost of the VCE offshore program should be clearly articulated within the costing model to enable government to understand the cost implications of this policy decision.

As a matter of urgency, the VCAA needs to establish a robust evidence base for the organisation's costs.

The VCAA should use this evidence base to agree a sustainable base funding level with the Department of Education. As a first step, this evidence base should begin by converting its current funding, including 'top up' the VCAA has been receiving, into the revised base appropriation. This revised base may be adjusted by a reduction in funding to some activities and refocusing the organisation's scope consistent with the recommendations of this Review.

#### 4.2. Create shared responsibility for – and robust processes to support – enterprise-wide decision-making about financial resources

The VCAA, as a public authority under the *Financial Management Act 1994* (FMA) is required to comply with a substantial body of requirements in relation to financial management and resource allocation. These include the FMA and the associated Standing Directions, and Instructions and a Resource Management Framework. Within this statutory framework, there is clear guidance on the need to steward public resources through robust resource management, budgeting and reporting processes.

We repeatedly heard from the VCAA that the financial implications of its decisions did not feature prominently in the evaluation of their merits and risks. This was due to the dual challenges of limited useful information being provided to unit leaders about their budgets, and a pervasive culture that prioritised operational outcomes above the resources consumed to achieve them.

Going forward, the VCAA should adopt the following financial management principles:

- design clear rules for budget management including business case costing methodologies that appropriately account for ongoing maintenance and the corporate overheads of initiatives
- integrate financial and human resource planning frameworks to provide an integrated picture to leaders of their available resources
- establish appropriate governance and variance control mechanisms at both executive and Board level to monitor and respond to financial risks that arise
- ensure that financial reporting and resource allocation feature prominently in both individual and collective performance metrics
- establish both formal and informal mechanisms to hold leaders individually and collectively accountable for the resource allocation decisions that they make.

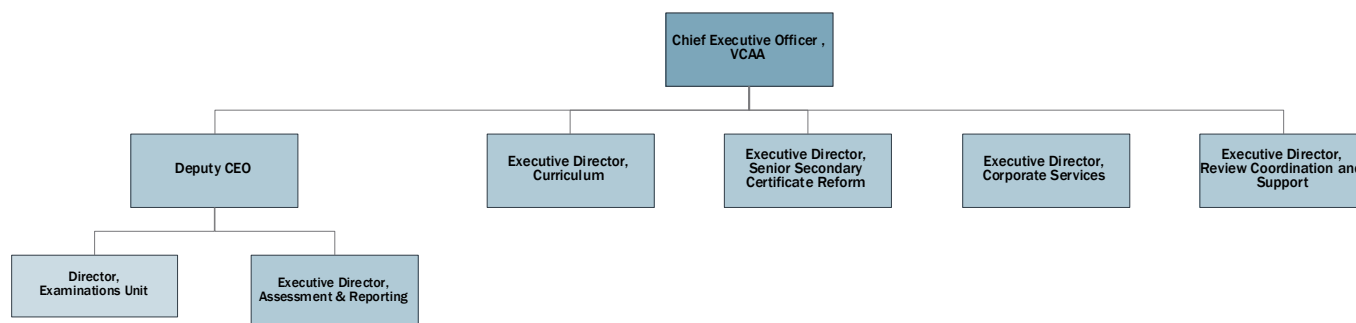
Each of these measures should be implemented consistent with the body of requirements provided by the *Financial Management Act 1994* and its associated requirements.

We have observed that the recently appointed CEO has begun to undertake the work involved to implement the changes suggested in sections 4.1 and 4.2 above.

## Recommendation 5 – Implement structural changes to strengthen accountability and refocus the organisation on critical capability uplifts

### 5.1. Reorganise the leadership structure to establish 3 senior executives accountable for examinations and assessment, curriculum and enabling services respectively

#### VCAA Executive leadership group (30 June 2025)



Our Phase 1 report discussed the need for end-to-end oversight and accountability for the delivery of examinations to better manage the critical path in examination development and delivery, ensuring that the downstream implications of upstream delays and issues were clearly understood and managed. As of June 2025, the split between examination development and examination delivery has been consolidated under a single executive, the designated deputy CEO in the chart above.

Unfortunately, operational accountability has been a recurring problem in the VCAA over a number of years. There has been a tendency, modelled from the top and echoed throughout, to put hard boundaries around where accountability begins and ends for activities and where ‘blame’ can be attributed to failures in another area or a particular individual’s role.

Handovers from one step to the next in VCAA processes are common points of failure. Some staff tend to attribute issues encountered in the VCAA to systemic failures such as inadequate resourcing or technology, or deficiencies in the performance of other functions. This dilutes accountability for organisation-wide outcomes that need to be achieved and the sense of agency to effect change. While structural change is a critical precondition to addressing this issue, effectively remedying a lack of felt accountability requires changes in culture and behaviours, leadership, and role clarity, all of which are addressed in subsequent recommendations.

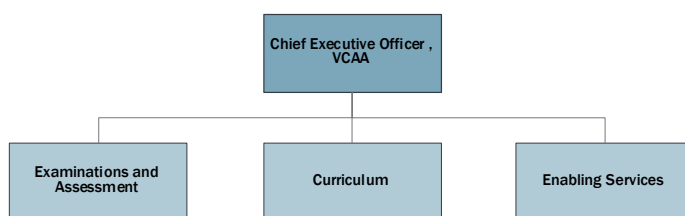
‘There is no collaboration among each other or other teams, no planning for the unit or their teams. There is a lack of trust between each other, no accountability for the delivery [of] their work or ensuring there are clear processes and approvals for their teams, and an embedded culture [of] helplessness... extensively complaining about staff behaviour, processes and resourcing, but not taking any action to rectify the situation.’

Public submission

At its core, the VCAA has only 2 critical functions to perform in the Victorian education landscape — delivering high-quality curricula, and standardised assessments. With a significant transformation journey ahead, a clearly aligned structure should support the VCAA in ensuring that it is oriented around its core functions and that clear end-to-end accountability is established from the executive level down.

Given the scale of each area and depth of capability required to effectively manage each mandate, it is recommended that 3 senior executive positions are established for examinations and assessments, curriculum and enabling services respectively. The latter position should be responsible for services such as knowledge management, project management, budget management, personnel services, technology and communications, none of which have been delivered consistently or effectively to date.

### Proposed VCAA functional structure



Implementation of the structural change required in examinations development and assessment should focus on:

- clarifying the examinations process end to end, by bridging the divide between the current functions where the process from handover to the current 'Assessment and Reporting Division' is largely invisible to staff in examination development
- establishing a clear, agreed 'critical path' that is understood across the entire function and by leadership across the business
- implementing more standardised end-to-end examination processes similar to those adopted in Queensland and Singapore.

### 5.2. Reassess resource levels in critical functions and implement VCAA-wide enabling functions to rebalance workload

Our assessment of the resources in comparable functions of sister organisations in other jurisdictions did not reveal that overall resourcing of the VCAA lagged those in most jurisdictions considered — Queensland, New South Wales, South Australia, New Zealand and Singapore (to the extent that they were comparable). However, it did reveal significant differences with other jurisdictions in terms of contemporary processes, performance management and consistent utilisation of technology.

As indicated above, many VCAA staff feel the pressure of workload and lack of capacity to meet all needs as a material constraint on the quality of their work. This is reflected in both the long hours worked in parts of the VCAA at peak periods in the year and the reliance on contractors to

supplement the VPS workforce (in addition to sessional roles such as examination writing and marking). Much of the workload is a product of:

- inefficient operational processes without clearly documented instructions, the layers of approvals needed and unclear accountabilities
- unclear quality standards, often over-engineered and left to individual staff to determine
- poor-quality technology and inadequate training for staff in using it
- in some areas, insufficient full-time resources allocated to each function.

As noted above, while overall resources appear adequate, a sustainable base of full-time, permanent staff and contractors is likely to be higher than is currently available.

‘I have also seen increased staff numbers in certain areas, yet this hasn’t resulted in increased productivity and deliverables that are error-free.’

Public submission

However, simply adding additional resources to existing ways of working would paper over underlying issues. This Review therefore recommends the following actions:

- authorising the Enabling Division to undertake a systemic assessment and lead the streamlining of existing processes ensuring that gaps are redressed to meet organisational priorities. Reassess resourcing levels in line with reset organisational priorities, with the aim of identifying opportunities to release capacity in areas that are less strategically aligned before further resourcing is requested
- clarifying the roles of curriculum managers with some workload shifted to the Enabling Division. This will free up more time for curriculum managers to focus on their core responsibilities
- developing a resource model to guide medium-to-long-term organisational transformation rebasing full-time-equivalent staffing including contractors.

### Enabling functions – resourcing the process gaps

Many processes in the VCAA are undertaken inefficiently as a result of different staff self-navigating how they should be done, engaging with processes sporadically and delivering them in a more complex way than necessary.

‘Depending on who you asked about the process, you received different advice. [...] It worries me that the most basic of tasks are done differently by various teams. I found that knowledge was not readily shared amongst colleagues and when questions were asked about processes (or the lack thereof) the answer was often “I don’t know why we did it that way, we just always have”.’

Public submission

Enabling functions in the VCAA, distinct from traditional corporate functions, should, in future, play an important role in organisational change and streamlining processes.

### Workforce planning and work sequencing

The work required at the VCAA is largely predictable and tied to outputs that generally have specific timeframes – examinations, curriculum reviews, audits and so on. However, much of the workforce demand seems to come as a surprise to the organisation, and problems are hastily managed on an ad-hoc basis (for example, curriculum managers ‘tapping into’ personal networks to fill panels). The workload, and management capacity, have also become unnecessarily strained by having large-scale policy initiatives (such as F–10 revision and VEYLDF) undertaken simultaneously without a clear understanding of the resources required for timely delivery.

Systematic VCAA-wide workforce planning is essential to understanding the work to be undertaken, timelines, the number of staff and the nature of resources required into the future. All VCAA executives should provide a clear roadmap in the areas for which they are responsible, and of how new initiatives would be timed and implemented to optimise load and budget demands. Such an approach should enable earlier recruitment of sessional staff and identify resourcing gaps that require earlier interventions.

### Knowledge management

Knowledge management should include development of standardised templates, supporting process documentation, and the development of organisation-wide standard nomenclatures and file structures that expedite information retrieval. Knowledge management should apply to all parts of the organisation to identify the highest-risk areas of institutionalised knowledge and to prioritise its capture. It should also, in time, incorporate tools for lifecycle management, particularly for curricula, to identify dependencies. Changes must be conducted on an as-needs basis rather than on a just-in-case basis, as is the current practice.

### Contractor management

Currently, each core function largely undertakes its own hire-to-retain processes. This results in large numbers of people learning and performing what should be standard processes in different ways. This creates strain, inefficiencies and, in some instances, practices that lack integrity.

An optimal process for an organisation that hires approximately 6,000 contractors a year should be managed by a central team with highly streamlined and technology-enabled processes, including role description catalogues, calendar management tools for interviewing and standard contracts.

The core functions' role would be limited to specifications (such as updating role descriptions where they have changed), evaluation (including the assessment of candidates) and technical onboarding.

## Enterprise helpdesk

There are several 'help desks' in the VCAA. While some have a clear pathway to a team (such as the NAPLAN helpdesk), others appear to be email addresses with unclear accountabilities for monitoring or which are monitored on an ad-hoc basis. The path that an enquiry takes through the VCAA is often confusing and requires effort on the part of the user as well as the organisation. It is likely that there is repetition of responses. The workload appears uneven, based on individual preferences for responsiveness rather than any organisational standards.

A single 'info@VCAA' helpdesk could consolidate and triage queries. Managing queries centrally would allow re-use of responses, support from technological tools to reduce manual processing and limit specialist input, including curriculum manager engagement, to where it is needed. Critically, it will allow the VCAA to track and measure how responsive it is to its stakeholders by monitoring average time to resolution and targeting areas for future improvements. Given that the tasks involved are not complex, it is recommended that a simple Customer Relationship Management (CRM) solution be considered as part of the helpdesk model.

## Program management, transformation, and continuous improvement

Delivering on wide-ranging recommendations will require a sustained transformation program. Trust and understanding of the operating environment are important to support change in an organisation that has often resisted it. A standing function should be established within the Enabling Division with deep expertise in program management, organisational transformation, and continuous improvement.

This function should be accountable for setting the quality standard and a 'VCAA way of operating' with respect to change and project management. It will also provide capacity to the business units to support many common-sense improvements that have been identified internally.

Early priorities of the program management, transformation and continuous improvement function should include:

- the curriculum review process, particularly adherence to timelines. This was raised as a problem by a very large number of submissions. As a result of timelines not being met and a lack of communication from the VCAA, teachers have often either lacked critical resources or received them late – for example, receiving examination specifications that changed how a unit should have been taught, after much of the unit had been completed. Stronger controls and oversight are needed to prevent reoccurrence

'The VCAA has had a longstanding issue with timeliness. For teachers, the release of a new curriculum or new study designs needs to be predictable and timely.'

Public submission

‘There is a lack of accountability for VCAA’s actions, exemplified by the recent (April) release of sample exam questions for the new study designs in 2025, despite the fact that approximately one-third of the curriculum content for the year has already been covered in classes ... Many teachers will need to backtrack and re-teach information in light of this, causing unnecessary workload issues and stress for teachers and students.’

Public submission

‘The late release of both the data booklet and the sample exam put myself and my colleagues in an exceedingly difficult position with our students. We spent the better part of a year (plus the whole of 2024) saying to our students “oh well, we’ll see, we’ll have a better answer for you when VCAA releases the data booklet, or when the sample exam comes out”. It was the blind leading the blind, and our trust in VCAA was totally eroded.’

Public submission

- reviewing the human resources reform program, which is in its fourth year and continues to miss milestones. Notwithstanding recent efforts to remediate this program, an end-to-end review should reset expectations and resourcing to provide assurance on delivery
- supporting the assessment and reporting functions in the proposed Examinations and Reporting Division to simplify its processes through investments in new technology
- ensuring that functions no longer contract resources to ‘fill gaps’ without approval by the Enabling Division.

### Curriculum manager resourcing

Curriculum managers play a central role in the operations of the VCAA. In practice, they tend to find their time divided between a large range of tasks, from administrative tasks, teacher support (including for new and out-of-field teachers), engagement with peak bodies, supporting school-based assessment audits, the provision of permission to schools to deliver VCAA-developed courses, and key involvement in the Season of Excellence. These tasks are in addition to their core functions of study design reviews and examination input. Curriculum manager time becomes a scarce resource adversely affecting delivery of their core responsibilities.

Part of the solution is removing administrative workload and improving support to these staff. Such support should include knowledge management, recruitment, and a helpdesk responsible for triaging and first-level responses. Equally there is a need for stronger management of the non-core tasks undertaken by curriculum managers; in particular, placing firmer boundaries around how curriculum managers contribute to different non-core activities. This will inevitably place some limits on the degree of curriculum manager autonomy where currently staff largely have full discretion over their priorities and how they deliver them.

In view of their critical role in both curriculum and examination development, further resourcing the curriculum manager pool in the following ways is recommended.

## Language program managers

Language program managers currently have the largest subjects span of the curriculum managers group, with oversight of up to 9 to 10 curricula and 7 to 8 examinations. They also tend to play a different role to other curriculum managers. Many smaller languages are not delivered by mainstream schools but by language schools (often operating on weekends) with vastly different resources and capacity for engagement with curricula, assessment planning and examinations. As a result, out of necessity, curriculum managers tend to be very hands-on in supporting these schools in implementing curricula and planning their assessments. Given Victoria continues to provide a significant breadth of languages, consideration should be given to Language program managers' workload through additional resourcing to reduce their span of responsibilities.

## Vocational Education and Training and Vocational Major program managers

As part of the Vocational Education and Training (VET) reform program, the curriculum work and assessment guidance has largely been delivered by the program team. However, with Vocational Major subject enrolments reaching up to 10,000 – noting that these rely on school-based assessment – and increasing enrolments in scored VET subjects, the VCAA should design a pathway for the reform program to transition to business as usual, with the appropriate resources allocated to the program manager.

## Other curriculum managers

Given the large number of subjects available to students in Victoria, the VCAA is on the lower end of resourcing for curriculum management. Many curriculum managers are required to take stewardship of subjects in which they have not taught. This would not be an issue in a model where the development of curricula and examinations relied more heavily on the input of panels or reference groups and curriculum managers were less central to the guidance and decision-making for teachers and schools. However, the risk of making such major changes to current arrangements disrupting the examination development is significant.

It is recommended that the VCAA should consider adding curriculum manager roles where the subjects for which managers are responsible are vastly different and the ability to transfer knowledge between subjects is more limited – particularly where high enrolments mean greater workload in relation to teacher and school engagement. Additionally, as recommended in our first report, the VCAA should consider the implications of examination banking across the work of all curriculum managers, and ensure that the balance of resourcing is still sufficient.

### 5.3. Undertake a work value assessment of roles in specific areas

Numerous executives and staff raised the issue of asymmetrical grading in the VCAA, particularly at the VPS5 and VPS6 level. There appears to be discrepancies in some divisions where similar levels of accountability and workload are graded differently. The indicative inequities impact staff motivation and a sense of fairness in their workplace.

It is recommended that the VCAA undertake a work value assessment (or appropriate equivalent) to procedurally determine whether re-grading is required in:

- Languages curriculum area

- Assessment and Reporting Division (below executive/VPSTEC levels).

#### 5.4. Consider outsourcing the delivery of the VCE Season of Excellence to more efficiently focus on core functions

In refocusing the organisation on its core priorities of curriculum and examinations, consideration should be given to the future of ‘non-core’ activities undertaken by the VCAA.

The Season of Excellence is a 5-month festival which showcases outstanding student work across a growing range of subjects, now spanning 6 categories across over 20 VCE and VCE VET studies. This program deservedly celebrates student work through partnerships with cultural institutions including the Melbourne Museum, the National Gallery of Victoria and the State Library. In addition to showcasing selections across the 6 categories, the Season of Excellence has expanded to include adjacent events such as education forums, skills seminars, and panel discussions with students and curriculum managers.

Given the breadth of the calendar that the Season of Excellence now encompasses, there is significant work associated with its execution residing within the VCAA. This includes 3 full-time resources and 3 surge positions for festival and events and, across the year, more than 50 casual contractors to support its delivery. The team is accountable for all logistics associated with delivering the season, from briefing schools about eligibility to coordinating logistics of moving design pieces from storage to the Melbourne Museum and printing the Top Scribe anthology.

While this is an excellent initiative – and costs are reasonable – the challenge that it creates is the complexity it drives into the rest of the organisation, particularly for curriculum managers. To deliver any one event, curriculum managers are involved in panel recruitment, reviewing all submissions or auditions (up to 1,000 in one category), shortlisting selections, making comments on selected works, delivering panel discussions and attending launches and events across the state.

As discussed above, the curriculum managers already have a heavy workload in undertaking their core business including curriculum revisions, teacher support and examination input. While curriculum managers may have the ideal skill set for many functions required for the Season of Excellence – and their participation is seen as important within the VCAA for preserving the integrity of the Season of Excellence – this is a lower-order priority relative to their other responsibilities, which impact large cohorts of students.

‘There is so much tension between the events team and curriculum – demands on workload and at times disagreement because a student’s work selected for the season doesn’t actually meet curriculum requirements.’

Public submission

Locating the Season of Excellence in the VCAA plays to the natural tendencies of the organisation to pursue the highest-quality outcomes in everything that they do, and to curriculum managers’ desire to maintain influence over their areas of responsibility.

In order to continue delivering a celebration of outstanding work, while putting stronger boundaries around the focus that this draws away from core work, this Review recommends:

- assessing a potential outsourced model, whereby the Festival and Event functions (including VCE Leadership Awards and VCAA Plain English Speaking Award) are delivered through a specialised events organisation. Demands on VCAA resources would be managed contractually and designed by the VCAA to limit engagement to only critical inputs as endorsed by the VCAA executive accountable for curriculum
- shifting primary accountability for chairing assessment panels to casual panel chairs or chief assessors rather than curriculum managers
- managing the budget and trade-offs of changes to the Season of Excellence, including the addition of new categories, in an explicit, costed, and transparent way through the VCAA executive accountable for curriculum.

### 5.5. Reaffirm the policy objectives for the Digital Assessment Library and better design business rules to support those objectives

The Digital Assessment Library (DAL) is an online resource providing classroom assessments aligned to the F–10 Victorian Curriculum. The DAL was commenced in 2018 and aimed – among other objectives – to address 2 policy challenges:

- many schools did not have access to high-quality assessments aligned to the Victorian Curriculum
- many schools were purchasing classroom assessments from commercial providers.

The DAL was developed as a solution to both problems by centrally designing and hosting free assessments for schools to use. It was intended to have the benefit of reducing reliance of schools on commercial providers and improving access to good-quality assessments.

The DAL now hosts more than 300 assessments across 5 learning areas. However, it is expensive, not widely used and is lacking a clear strategic direction.

#### The DAL is expensive

From the 2017–18 to 2023–24 financial years the DAL received funding of \$29 million. The operational costs of the DAL are currently funded on an annual basis. Consequently, there is a level of uncertainty from year to year as to whether the funding will be continued. It has also incurred additional costs due to the need to adapt to broader policy decisions taken by the Department of Education and VCAA, such as a review of 13,500 individual items to assess whether they aligned to the new Victorian F–10 Curriculum. This resulted in the need to employ 135 sessional staff who required training in the specifics of VCAA content, style guides and question taxonomy.

#### The DAL is not widely used

In 2024, there were 827 schools with students who had completed at least one DAL assessment. This represents approximately half of all government schools, most of which are primary schools. Penetration in the Catholic and independent sectors is less than 15% of schools. Schools are also often not using the DAL in subsequent years after having used it the first time. Twenty-nine percent of schools that used the DAL in 2023 did not use it again in 2024. More than 500 government

schools and 260 Catholic and independent schools have registered with the DAL but did not use it at all in 2024.

‘Members responding to the survey supporting this submission reported low levels of engagement with the VCAA’s Digital Assessment Library and Insight Assessment Platform. Primary school teachers were more likely to engage with these tools than secondary teachers, which aligns with the fact that most of the assessments on the Insight Assessment Platform are designed for primary students. Despite this, 33% of primary teachers reported that they never used the platform and 33% also reported only using the platform “rarely”.’

Public submission

There are, however, some schools using the DAL frequently. Ten schools accounted for 70,000 of the approximately 275,000 DAL assessments conducted in 2024. These frequent users are all government schools and predominantly primary schools. While some schools are clearly getting value from the DAL, it does not appear to be achieving its broad system-wide objectives of improving access and gaining efficiencies of scale in the delivery of school-based assessments.

### The DAL lacks a clear strategic direction

The DAL does not have clear ownership and governance within the VCAA and has been limited by the lack of a clear strategic direction. This has resulted in confusing decisions, such as previously hosting the DAL on a different technology platform to that of an assessment library operated by the Department of Education and later consolidating it onto the same platform at a significant cost.

The Department of Education should critically review the DAL’s status against its contemporary policy objectives with 2 possible outcomes.

- Recommit to the DAL and invest in improving user experience, outreach to schools to drive take-up, and align existing assessments to the Victorian Curriculum F–10 Version 2.0. Consideration should be given to guidance by the Department of Education to government schools to preference the use of the DAL before accessing commercial providers. Consideration should also be given to the establishment of a subsidiary business unit, which might look to commercialise the assessments in other jurisdictions by mapping the existing assessments’ suitability for other curricula. This may help to defray the ongoing costs of system maintenance and examination upkeep through an appropriate cost-recovery arrangement.
- Undertake a managed wind-down of the DAL by completing the current program of transferring the DAL’s underlying technology system and the process of aligning questions to the Victorian Curriculum F–10 Version 2.0. Defer any further investment in new assessments and consider opportunities to realise value by transferring the library to a commercial or not-for-profit provider who could maintain (and potentially invest in or increase) the library based on contractual service standards established by the VCAA with the support of the Department of Education.

## 5.6. Transfer ongoing responsibility for the Victorian Early Years Learning and Development Framework (VEYLDF) from the VCAA to the Department of Education

The VEYLDF has been developed through a partnership between the VCAA and Department of Education since its initial implementation in 2011. Victoria has historically been a leader in the early years learning space, supporting many of the foundations of the national framework.

Revisions to the national framework have since been adopted by Victoria in the most recent iteration of the VEYLDF. This is currently approaching completion after its most recent review, which commenced in 2023 and maintains Victoria's distinctive birth-to-8 view of childhood development.

The VEYLDF is distinctive amongst the VCAA's learning frameworks in that it applies to a broad set of stakeholders in different 'learning' environments and with widely varying capacity and capability to engage with an early learning framework. Early learning environments where the VEYLDF applies include Three-and Four-Year-Old Kindergarten, day care (including family care, long day care, occasional care), after-hours care in schools, F-2 classroom settings, Maternal and Child Health Nurse services, facilitated playgroups and cultural organisations.

While some of these educators, such as primary teachers and kindergarten educators, have access to resources including professional development time and support, and the relevant experience to engage with learning frameworks, many do not. The accessibility and support requirements for the VEYLDF, to have an impact from birth-to-8, are consequently different to those of curricula for primary school and beyond.

The most recent revision of the VEYLDF has faced structural and delivery challenges, including significant staff turnover during the process, loss of relevant early years expertise, and limitations in the ability to engage a broad cross-section of the sector it seeks to support. These issues notwithstanding, current reports from the Department of Education and VCAA indicate that the most recent revision is broadly of high quality and supported by the sector.

As with VCAA curriculum revisions, following the update of the core framework, work turns to implementation-support activities such as the development of training materials for practitioners, and managing ongoing queries from the sector. However, as the VEYLDF transitions from its intensive framework revision phase to a support and implementation phase, there are a number of persistent issues that require resolution:

- friction at the interface between the VCAA and the Department of Education: including facilitating effective engagement with the Minister for Children and timely opportunities for input and decision-making, poor sequencing of consultation with the Department of Education and sector, and challenges in escalating issues
- lack of appropriate senior oversight within the VCAA: the VEYLDF, for most of its recent revision, operated with limited executive oversight, and consequently, many decisions and critical engagements have been borne by lower-level staff. Informed, consistent senior engagement appeared to be limited to a former Board member with relevant early years expertise providing guidance to VPS-level management, leaving a significant gap in engagement in the layers in between
- changing direction with changes in CEOs: quality of departmental engagement and interpretation of the VCAA's role in early years learning has been reported as changing

significantly between CEOs, swinging from a strong appetite to permanently resource the VEYLDF within the VCAA and act as the primary driver of the framework, to a more collaborative partnership approach. These changes have strained relationships with the Department of Education

- need for strengthened sectoral feedback loops: while the VEYLDF has been well received as a high-quality learning framework, feedback commissioned by the VCAA also indicates that it is heavily academic and educators find it challenging to put into practice. Outside of the feedback taken in review cycles, the VCAA does not measure or review measurements of learning outcomes from birth-to-8. Consequently, it is difficult to assess whether the balance of academic rigour and practical application is effective, and where there is need for stronger learning guidance. This can only be achieved through broader, more consistent engagement with the sector.

Following the most recent revision, the VEYLDF is unlikely to undertake another major review for another 5 years, with resourcing due to scale down accordingly. The question for this Review then is where the ongoing work of the VEYLDF would have the most significant impact. The nexus with the VCAA strengthens the availability of curriculum expertise, while the Department of Education, as the regulator of most of the learning environments where VEYLDF applies, strengthens the nexus with the sector and the needs of early learning professionals ‘on the ground’. The alignment to the sector through the Department of Education presents an opportunity to better tailor support materials and ongoing support to a broader cross-section of learning environments – not only those with the capacity to engage with reviews.

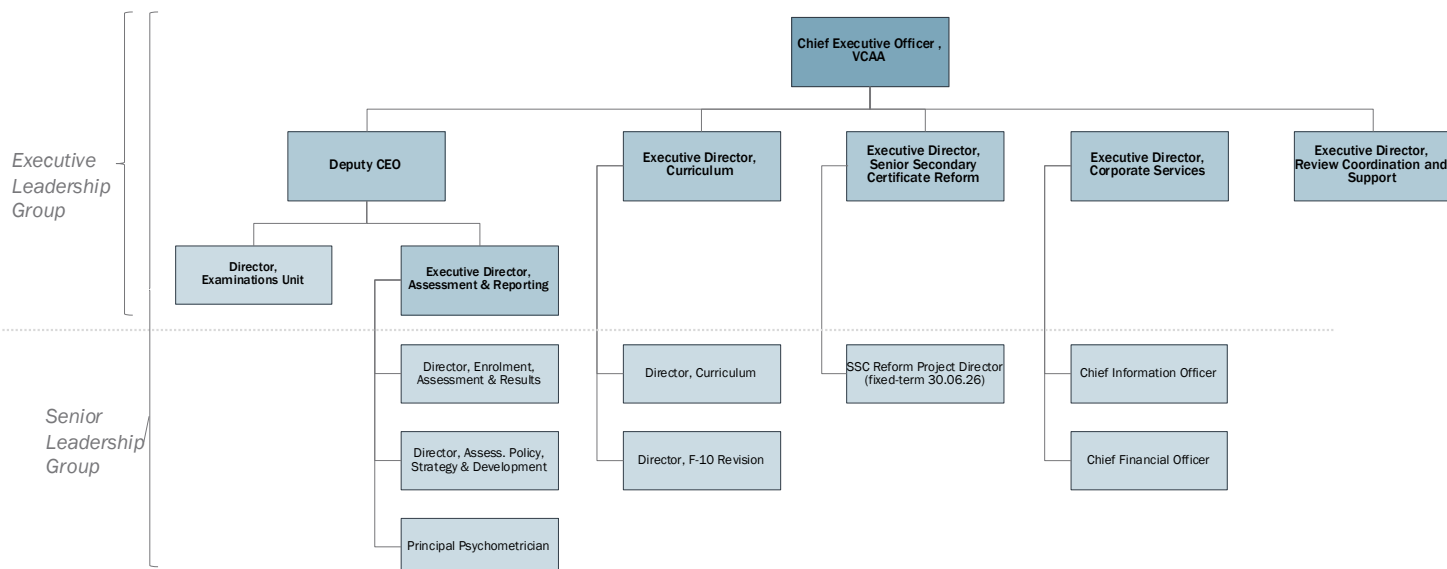
The further advantage of alignment with the Department of Education is the dedicated focus of the Early Childhood Education group, resolving the challenge of absent leadership focus in the VCAA – which, despite new leadership, may be exacerbated by the VEYLDF shifting into a business-as-usual ‘monitor and support’ phase. This would also create the opportunity to reset departmental relationships.

This Review recommends that the ongoing responsibility for the VEYLDF be transferred to the Early Childhood Education group in the Department of Education, with governance over changes to the learning framework itself continuing to be undertaken by a joint committee with the Deputy Secretary of the Early Childhood Education group and the VCAA CEO. Future revisions or substantive changes to the framework should be delivered in line with previous practice by the Department of Education effectively contracting the VCAA to access curriculum expertise, noting that the curriculum managers would retain responsibility for working with the department to ensure a coherent transition between early years and school curricula.

## Recommendation 6 – Reset organisational leadership, capabilities and culture, commencing with a progressive spill-and-fill of senior roles

### 6.1. Progressively spill-and-fill executive level positions or equivalents across the organisation, with the exception of the recently appointed CEO

#### VCAA Executive leadership group and Senior leadership group (30 June 2025)



Many of the issues manifesting in the VCAA today trace their origins to poor management in many parts of the organisation over a number of years. Public submissions and engagement with VCAA staff in numerous business units highlighted a lack of confidence in leadership guiding the organisation and maintaining an acceptable working culture.

The legacy challenge now being faced by the new CEO is that there have not been clear and consistent leadership expectations of those appointed to executive roles. Appointments to these roles have been on the basis of technical expertise, institutional knowledge or stakeholder relationships. However, there has not been an expectation that the executive staff operate collaboratively as strong people-managers and organisational leaders.

‘The senior leadership... [have] no collaboration among each other or other teams, no planning for the unit or their teams. There is a lack of trust between each other, no accountability for delivering their work or ensuring there are clear processes and approvals for their teams, and an embedded culture [of] helplessness.’

Public submission

Themes related to leadership issues that consistently emerged in our consultations or were directly observed by this Review include:

- reinforcement of organisational siloes and norms by restricting the sharing of information, ostensibly for confidentiality purposes
- lack of proper induction processes for new staff

- failure to understand the roles and time constraints of other teams, resulting in negative perceptions about their capabilities
- inconsistent or absent fundamental people-management practices including regular one-on-one meetings with direct reports, discussion of role expectations and priorities, performance-management processes and identification of staff development needs – including, in some instances, training in technology fundamental to the role being performed
- inadequate budget management, with the assumption that it is the role of the executive to manage budget issues and ultimately requiring the Department of Education to deal with any shortfalls at the end of the year.

The VCAA has a significant change journey ahead, which will rely on stable, assured and positive leadership. Its new leaders will need to articulate a future for the VCAA that rebuilds not only public trust, but trust from their workforce that the efforts and challenges endured will deliver a better, stronger organisation. People in senior leadership roles will need to operate as a genuine leadership team working toward collective goals and not individual tasks. This more collaborative approach needs to penetrate the entire organisation.

A progressive spill-and-fill process will allow the new CEO to set clear expectations for the executive and other people managers, and subsequently, be explicit about the capabilities they must demonstrate or develop. This will be an important part of shifting some of the more deeply entrenched behaviours that have gone unaddressed in recent years and will give staff confidence in what they can expect from their senior leaders. This recommendation has begun to be implemented by the recently appointed CEO.

‘... staff members need to be able to trust that there will be follow-through and consequences, otherwise, the VCAA is reinforcing the current culture and staff won’t feel there is any point in reporting behaviours, as they are accepted by the organisation.’

Public submission

A spill-and-fill process naturally creates uncertainty for those affected. To minimise instability, the timelines for this process should be communicated very clearly and delivered as efficiently as workforce change processes allow. Sequencing will also be required to reduce impacts on some areas during their peak periods.

## 6.2. Reset organisational strategy with a clear statement of priorities and values

‘We don’t have a strategy, we have a plan on a page... no executive involved in the development of that plan is still here to own it today.’

VCAA Cross-Functional Culture Workshop

The VCAA is very clear about the importance of delivering examinations, and the events of the past few years have reoriented organisational focus acutely on the assurance of examinations in

2025. However, it is apparent that staff do not have a clear framework discriminating between important and less-important activities. To date, little guidance has been given by the VCAA's leadership.

There are certainly some functions and activities that are deprioritised, but this typically does not appear to stem from a clear decision made about the need to do so. Rather, it occurs due the apparent urgency to deal with a problem.

This Review has seen limited evidence of an enterprise-wide change agenda outside of external reviews to address recent problems with examinations over the past 3 years. As a result of this lack of executive direction, as indicated above, different work groups have been able to exercise significant autonomy in how they deliver their functions – particularly with respect to the use of contract labour.

'There is not a way of managing the priorities of the organisation across all of these types of work. Directors are pushing projects and other work under their jurisdiction. Decisions are made by senior management without regard to the resources and time required to implement them. An example is the Student Portal project where Assessment Applications was required to provide immediate support to an external project team with no prior notice... for most of 2024 it involved most of the Assessment Applications staff.'

Public submission

It is incumbent on the VCAA to consider whether there are activities they could stop doing, undertake to a lesser standard or deliver using different tools or ways of working before seeking to increase their resource base.

This change needs to begin with development by the Board of a detailed organisational strategy that specifies the organisation's priorities and cascades through to business planning and associated budgets.

The development and implementation of such a strategy will require trade-offs to be made. These include the need for investment in bolstering capability, strengthening resourcing, and changing the way particular activities are undertaken and where efficiencies can be identified. Ensuring that the CEO is accountable for delivery of the strategy will be essential.

### 6.3. Increase the focus of leadership on the culture of the organisation and the patterns of acceptable behaviour to achieve its goals

Every organisation has a distinct culture. It is the patterns of behaviours that shape 'how we do things around here'. Culture is driven by the collective informal, habitual actions of the individuals that make up the organisation. For some years, in part because of lack of leadership, there has been little consistency or clarity in articulating what the VCAA's culture should be, or active management of the less-desirable aspects of the VCAA's culture.

Put bluntly, many of the root causes of the issues within the organisation stem from a culture in need of fundamental change and renewal.

‘There is an endemic bullying problem at the VCAA, which senior management seems unable or unwilling to address effectively.’

Public submission

Staff within the VCAA identify strongly with the ‘authority’ component of the organisation’s name and the concept of being ‘expert led’. It is, of course, desirable that the VCAA can provide definitive, well-evidenced positions on what all students across the state should learn so they may be properly equipped for the future. However, the concept of authority has taken on a life well beyond the outputs delivered by the organisation; in many instances, it has come to be embodied in staff and their expectations of how they can engage both internally and with their stakeholder environment.

This manifests in behaviours where some staff dictate what ‘must’ be done to ‘maintain quality’ and take the view that they cannot be challenged due to their expertise. Managers and executives across different areas have expressed to this Review that they find themselves unable to break through cultural barriers in their units unless they were appointed from within the unit or had the right ‘background’ to demonstrate credibility. This impacts on their ability to effectively direct their staff.

Unsurprisingly for an educational institution, the organisation respects knowledge. Staff recognise the need for deep expertise and strive to deliver the best outputs, particularly curricula, through that expertise.

By contrast, people management, project management, stakeholder engagement and capacity to influence people have been seen as lower-priority capabilities for appointment to positions. At its worst, as indicated above, this has resulted in dismissive behaviour, siloes (‘what could they know about my area’) and occasionally allegations of bullying. Our consultations have consistently revealed that such behaviour has made it difficult for those without a teaching or educational background to have impact in the organisation. These behaviours, in part, explain why there are not more contemporary and standard business processes and management controls present in the VCAA.

The perception of independence extends beyond the interface with the department, addressed in a previous recommendation. Operationally, ‘independence’ in the VCAA is a watchword that manifests not only in the lack of information-sharing and joint decision-making between the VCAA and the department, but in eschewing organisational practices, values and ways of working expected in the public sector. This includes briefings and timely consultations with senior management, and a resistance to many public service-wide imperatives such as reducing underutilised accommodation.

As a result of problems with the examinations over successive years, the mode of operating at the VCAA has become increasingly reactive. Rapid-response situations have embedded a way of working that bypasses authorised processes and, in some areas, gives little consideration to the views and experience of staff or the education sector more broadly.

‘Many decisions appear reactive, driven by fear of bad press rather than sound process...The VCAA’s culture is shifting— from an open, consultative organisation to one driven by fear, secrecy, and unchecked authority. Decisions that once followed transparent processes are now made by individuals who appear to act without accountability.’

Public submission

There is a general acceptance amongst staff at the VCAA that the organisation is too under-resourced to give time to prepare process documentation and undertake organisational improvement or transformation, and that such things cannot be attempted in a business-as-usual environment. Systematic, planned change management is not evidenced in the VCAA. Even reactive changes, once implemented, do not appear to have a clear direction of ‘what’s next’ – as in, how the way of working will evolve or improve.

Consistent feedback across a range of settings is that the VCAA operates under a culture of blame and, sometimes, tolerance for poor behaviour. Blame is often assigned swiftly and publicly, and often across organisational functions. There is a strong conviction that other functions are not performing adequately or that issues originate in other functions, reinforcing deep organisational siloes. Consequently, there is very little collective accountability.

Concerningly, in a small number of units, there also appears to be a culture of fear. Staff in these areas are concerned not only about being blamed but about being the subject of sustained criticism or the target of retribution. The behaviours that have become normalised in these areas include a willingness to engage unprofessionally in disagreements, a tendency to critique others and a lack of respect for colleagues.

‘Staff are afraid to speak up and voice concerns due to potential repercussions. Others don’t take the time to share their opinions because they get knocked down. The VCAA is a workplace that does not provide any degree of psychological safety to staff.’

Public submission

Numerous staff told us that they have consistently raised concerns about leadership’s tendency to ‘walk past’ poor behaviours and tolerate them – particularly if the person demonstrating them is deemed to be mission-critical. It is disappointing that successive leadership groups have created the authorising environment that has allowed poor behaviour to become the accepted standard.

The importance of addressing these problems going forward cannot be understated. Leadership will need to be clear and sustain focus on:

- setting expectations for the specific behaviours that are acceptable and those that will never be tolerated – and demonstrating follow-through on these expectations (including through formal action, where this is warranted)
- creating a clear sense of ‘one organisation’ where everyone plays a valued and important role in delivering on the mission of the organisation, and ensuring this is visible and celebrated

- giving focus and time to important enablers of cultural change including process improvement, change management and information-sharing from leadership
- role-modelling desired behaviours, particularly increased tolerance for a continuous improvement approach and encouraging accountability as positive rather than punitive
- identifying and activating informal leaders (those with wide and trusted networks throughout the business) who can role-model and propagate positive behaviours.

It is important to note that undergoing a fundamental renewal of culture will be extremely challenging if staff are not physically present in their workplace to experience the changes in behaviours and expectations. This Review has observed – and accommodation data validates – very low occupancy in the VCAA head office.

Going forward, the VCAA will need an agreed standard of working in the office that aligns with general government policy to ensure that transformation is undertaken in a timely and efficient way.

Notwithstanding the cultural challenges discussed in this Review, staff in the VCAA overwhelmingly continued to express their gratitude for having a ‘dream role’ in education and the privilege of the position they occupy. This is demonstrated in their continued commitment and hardworking efforts across the organisation in challenging circumstances, including in 2025. If leadership can harness the positive aspects of the VCAA’s culture and the goodwill of staff to drive a transformation journey, the impact on the organisation will be material.

#### 6.4. Implement structured training and mentoring for all people-managers

As previously outlined, leaders in the VCAA have often been selected for their technical expertise or institutional knowledge without consideration to whether their people-management skills are sufficient for their responsibilities. As a result, leaders have not been well equipped to manage cultural challenges, performance and other people issues. Staff responsible for managing the work of others play a critical role in creating the right environment for their staff, as well as driving cultural transformation at every layer of the organisation.

To this end, it is recommended that the CEO:

- requires formal leadership training for all people-leaders in the VCAA. This training should include expectations for providing and receiving feedback, conflict management, connecting strategic objectives to team objectives, inclusive leadership and psychological safety, budget management and priority management
- ensures that one-on-one meetings with direct reports, regular performance reviews including a staff development component, regular team and division meetings and organisation-wide culture surveys are mandatory and compliance-monitored
- implements a structured mentoring program that provides leaders with guidance and a sounding board outside of their direct reporting line.

The Senior Leadership Group (as outlined in section 6.1 above) will be essential to driving systemic change through the organisation. Activating this group as a genuine senior leadership team will be an important task for the CEO. The disconnect that has been commonly reported

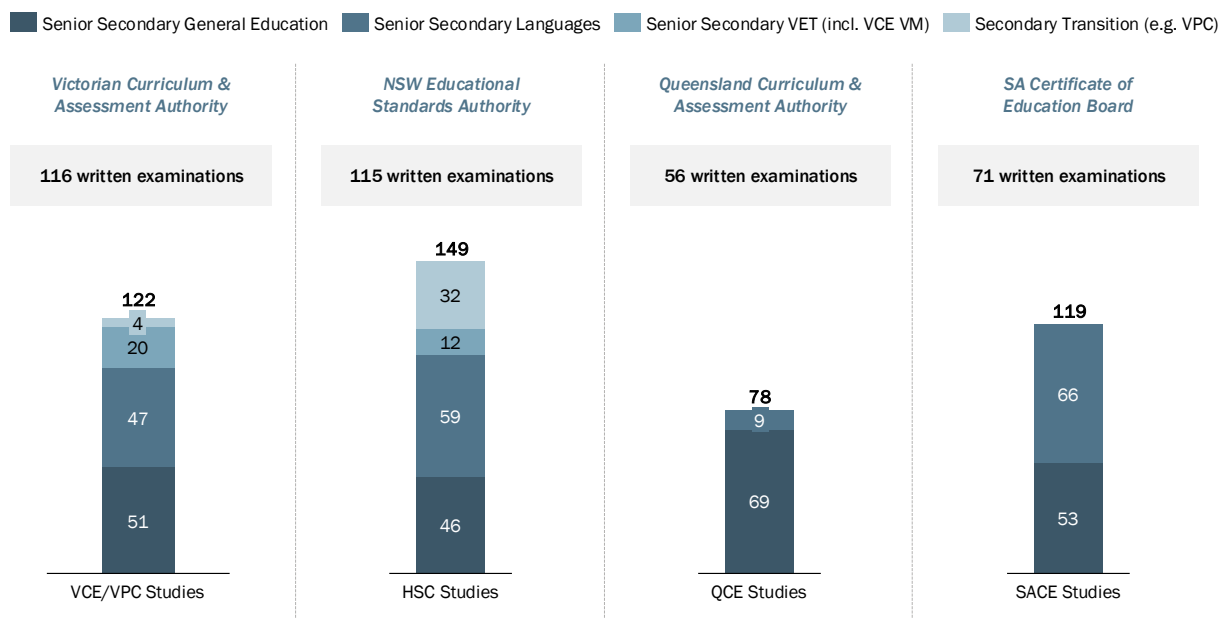
between executives and other layers of the organisation points consistently to a lack of transparency around decision-making and strategic priorities.

As a first step, the Senior Leadership Group should have regular meetings with the executive; these meetings should include dashboard reporting on operational priorities, budget and critical metrics. These meetings should be a forum to discuss decisions, ask questions openly, share views on what is working and not working in terms of organisational change and build a better understanding across the organisation of each team's remit and what they do. The objective should be to build a sense of shared ownership for strategic outcomes at this level, as opposed to allowing ownership to remain bounded in organisational siloes.

## Recommendation 7 – Critically review and redesign operating policies and processes

### 7.1. Consider alternative assessment processes for low-enrolment subjects

#### Number of examinations and studies by curriculum type, 2024 (select jurisdictions)



Victoria has one of the largest subject offerings in the country, particularly in terms of accreditation through external assessments. As is appropriate for a learning authority, the effort expended in developing high-quality curricula and examinations does not vary by the number of enrolments in a subject. However, of the subjects offered in Victoria, 36 have enrolments of 100 students or fewer. Twenty-one subjects have enrolments of 20 students or fewer. The majority of these are languages, 9 of which had fewer than 10 students last year. There are 6 different music subjects offered across VCE and scored VET in Victoria, half of which have enrolments of fewer than 250 students.

Many of the challenges in the VCAA can, in part, be traced back to the complexity of managing such a large range and number of subjects, all requiring a significant base workload. A subject with fewer than 100 students enrolled is subject to the same examination development process as one with tens of thousands of students.

While the VCAA Board has previously discontinued studies including Mathematical Methods: Computer Based Examinations, this appears to be an ad-hoc response to limited enrolments and technical issues. A consistent, more considered approach to addressing low-enrolment courses would enable the VCAA to better address issues arising from low-enrolment courses.

While acknowledging that decisions to cease studies are often more difficult than decisions to add subjects, this Review recommends that the VCAA, working with the Department of Education, undertake a review to:

- determine whether there is capacity to deliver a low-enrolment subject through a Higher Education Studies model (where first-year university subjects are taken as part of their final

year studies) or, alternatively, whether there are sufficient alternatives available in adjacent study areas to retire the subject

- while all language studies are equally important, the VCAA could assess the potential for language studies with fewer than a threshold number of enrolments to be delivered through a model without external assessment, similar to the unscored VET subject model – where the subjects would then contribute to a student's ATAR as a fifth or sixth subject with an extrapolated score
- assess whether any language subjects have fallen below the national small candidature language threshold (Collaborative Curriculum and Assessment Framework for Languages or CCAFL) of 15 or more students nationally who sit the examination each year.

## 7.2. Redesign school-based assessment audits to apply a risk-based model

School-based assessment audits feature heavily in the work of the VCAA curriculum unit. The purpose of these audits is clear. With school-based assessment constituting half of a student's ATAR score, it is essential that all students, irrespective of school, sector or demographic, are assessed appropriately and fairly. The current process, however, may not be the best model for achieving this objective.

The VCAA audits schools in accordance with internal business rules, which ensure that all schools and 10% of subjects are audited annually. While guidance on what must be done is clear and well documented, the rationale for why this is the appropriate number of audits is not and, like much of the institutional memory in the VCAA, appears to have been lost in staff turnover.

In 2024, the VCAA employed approximately 100 state reviewers to undertake 1,833 audits of school-based assessments. The process is overseen by an internal team, with each audit outcome signed off by a curriculum manager. A number of issues emerged in our consultations.

- In 2024, across all subjects, there was an average 40% failure rate for the first round of audits. In submissions received by this Review, teachers have indicated that they struggle to understand what the audit process is seeking to determine. The second round of audits, conducted on those who failed the first round, brought the failure rate down to 4%. Numerous teachers in anonymous submissions identified that audits could, and have been, completed by submitting 'what the VCAA wants to see' and then applying a different practice in the classroom.
- VCAA staff have advised that the reason for the large percentage of first-round failures was 'lack of compliance with the study design' and 'insufficient evidence to demonstrate compliance'. The causes of these failures are not examined, including the potential lack of clarity in the study designs themselves or the poor design of audits in eliciting the responses required.
- Successful completion of audits in the first stage varies widely between subjects. In one subject, 99% of the audits resulted in a 'pass' outcome in the first stage, and in another, only 16% of the audits resulted in a 'pass' outcome in the same stage. To attribute these variances entirely to schools themselves is improbable. The clarity of audit requirements, support provided, and different standards of different curriculum managers are also likely contributors to these variations.

- Curriculum managers are required to audit subjects on an annual basis even if the curriculum specifications have not changed.
- There is duplication of effort between the roles of the state reviewers and curriculum managers. Curriculum managers will, at their discretion, rewrite findings if they do not agree with the position put forward by the state reviewer. This is not a designed-in quality assurance process and it is not practical for curriculum managers to review up to 300 audits to assess whether they agree with the positions, or rewrite them when they do not agree.

‘The curriculum managers are out of touch and play the role of poor police instead of supports. The audit system is punitive and punishes teachers and schools.’

Public submission

‘Schools, and teachers, falsely represent what they do in their school assessments to make sure that they pass the audits. In general, the processes outlined by VCAA for the school-based assessments is unmanageable in the times that teachers have available.’

Public submission

‘As teachers, we grow tired of interpreting VCAA’s vague documents... only then to be told “that’s not up to scratch” by the same faceless people via an audit report. It is a sinking feeling.’

Public submission

To address these issues, this Review recommends:

- critically reviewing the end-to-end audit process, clearly flagging double-handling steps and identifying where these can be eliminated or different guardrails applied. State reviewers should be given guidelines to limit themselves only to comments relating to study design and should self-edit their audits. While the VCAA has resisted eliminating checks for fear of criticism, the consequences of a typographical error in an audit compared to the consequences in an examination are fundamentally different. The same standards should not be applied across all activities but concentrated where they have the most impact
- considering whether approvals are genuinely value-adding. Currently, many curriculum managers report being unable to review the outcomes of audits due to their overall workload. Regardless, they are required to sign off on each audit. This not only creates a bottleneck in the process, it also creates the perception that the curriculum manager has personally reviewed and endorsed the outcome. The prevailing counterview has been that

the VCAA cannot devolve responsibility to 'contracted staff' as they cannot represent the view of the VCAA. In many cases, however, this is what is happening. A more transparent approach would shift the final sign-off to the responsible state reviewer with a formal escalation pathway to the curriculum manager

- reconsider the policy under which audits are implemented. The business rules applied to audits should be revisited to implement a risk-based model rather than 10% of each subject annually. There may be a need to undertake larger sampling in the first 2 years after a study design has been implemented, for example, but a much smaller percentage may be sufficient for remaining years. Improving the impact of audits, which ultimately seek to ensure that schools are appropriately assessing the study design, could be achieved by applying risk-based triggers for auditing. For example, half of all audits could be assigned based on the failure of 2 successive audits in a subject area, with the other half undertaken on a random basis (reflecting the proportions of each school sector)
- the VCAA currently undertakes trend reports on the outcomes of audits. However, it does not appear that there are subsequent actions to examine study designs, guidance given to schools or the individual quality standards applied by curriculum managers
- audits play an important assurance function, but the ultimate objective is to support teachers to deliver high-quality, fair assessments to their students. The VCAA should ensure that the tone of audits reflect a constructive and not punitive intent. The VCAA should advise state reviewers to communicate with teachers in the appropriate spirit.

### 7.3. Gradually eliminate key-person risk through the preparation of written documentation of all business processes

Operating processes, previously well documented, have long stopped reflecting the current state of organisational practice. The VCAA's 2 core functions are highly vulnerable to turnover of key experienced staff due to institutional knowledge being solely embedded in their practice.

In addition, limited process documentation has resulted in work practices that are highly individualised. New staff raise issues regarding the absence of induction processes and the time it takes to self-navigate and learn their roles. This results in the creation of new individualised processes by these staff.

Collaboration is inhibited by the inability to gauge reasonable expectations of others as practices and preferences vary from person to person. It also results in far greater vulnerability to error because processes that are not documented are difficult to validate, constructively challenge or enable development of alternate approaches. These challenges are widely acknowledged by the current leadership of the VCAA.

The common reason given to this Review is inadequate time to undertake the writing of process documentation. The VCAA is constantly in a cycle of production, albeit one with peaks and troughs.

It is essential that process documentation becomes part of the expectations of business-as-usual work. Delivery of such documentation will be contingent on management prioritising this work and enabling each layer of the business the time and resources to undertake this task.

Preparing practical and accurate process documentation is particularly critical within the proposed Examinations and Assessment Division. The assessment and reporting process is a large-scale, sensitive operation run with relatively lean permanent teams and decades-old technology, relying significantly on manual processes.

Management has recently been active in acknowledging and seeking to mitigate this risk, and there is work underway to document processes in this area.

Appropriate management of key-person risk should include training additional staff to assume some of these responsibilities and reviewing and streamlining processes with the support of technological tools. Further resourcing to support this work should enable key staff to focus on continuous improvement and long-term stabilisation of the assessment and reporting functions.

#### 7.4. Reduce complexity and cost built into the General Assessment Test process by providing clearer specifications and removing double-handling

The General Assessment Test (GAT) is developed and administered by the VCAA to more than 95,000 students as an input into quality assurance processes for school-based assessment scores, anomalous grades and Derived Examination Scores. It also fulfils a policy objective of reporting student achievement against numeracy and literacy standards. Despite not directly impacting study scores for the majority of students, it is treated as an important pen and paper practise test for VCE for students. The VCAA could substantially reduce the ongoing costs involved with delivering the GAT by removing double-handling and simplifying processes by moving towards digitisation.

The VCAA has an ongoing contract to develop items for the GAT and conduct psychometric testing of item quality. Both of these processes involve double-handling.

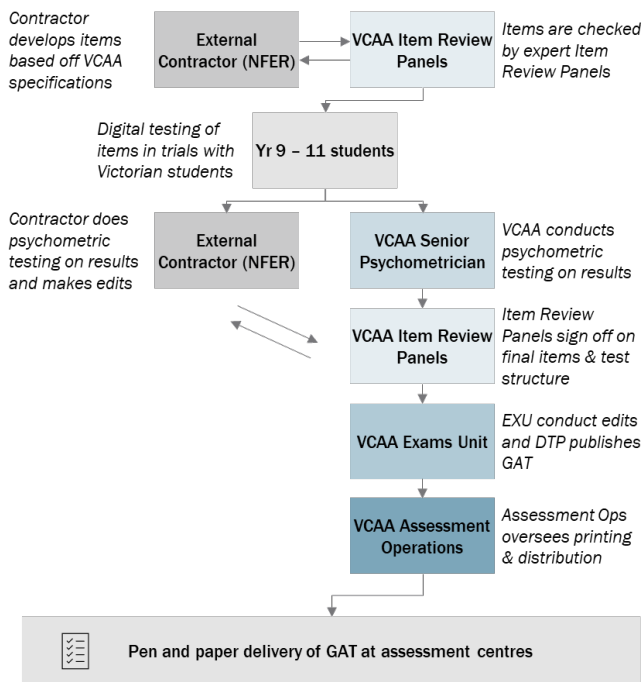
While items are initially developed by the external provider, the VCAA also recruits more than a dozen sessional staff trained in item-writing to review and refine GAT items. Anecdotally, this can often include completely rewriting the externally developed items due to inconsistencies in the quality of their outputs.

To ensure items are of the suitable standard to adequately distinguish between students, the VCAA organises for a cohort of Victorian students from years 9 to 11 to trial a randomised selection of these items each year. Analysis of these results is conducted both by the VCAA's internal psychometricians and those of the external contractor, before deciding which items should be selected and finalising the tests' structure. An analysis of whether this double-handling adds sufficient value to the development of GAT items would be desirable.

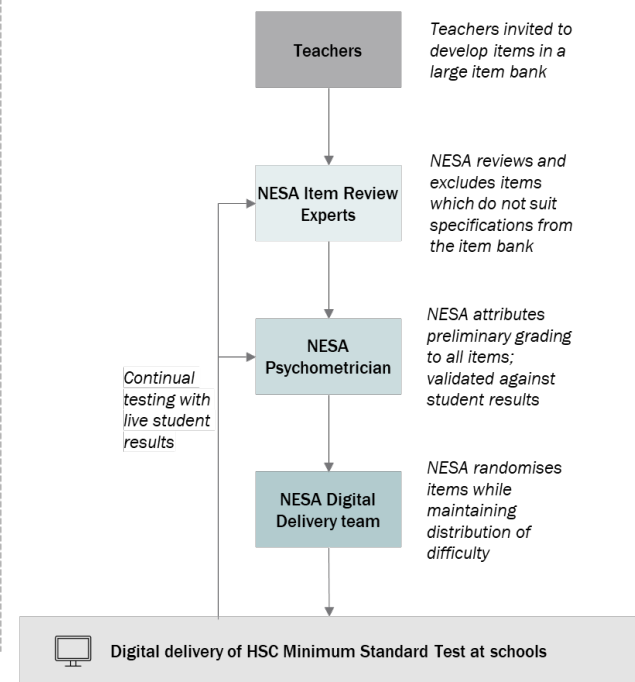
By contrast, the NSW Education Standards Authority (NESA) develops its comparable HSC Minimum Standard Test more efficiently by involving teachers in the development of a large item bank, which is refined by its internal experts before being delivered online to students. Questions are randomised within a set difficulty curve and student performance against each item is used by NESA to refine the question. Utilisation of a similar process and adoption of digital delivery methods could enable the VCAA to reduce the cost of the GAT significantly, reduce time investment from schools and improve the user experience for VCE students.

A comparison of the 2 processes has been included below.

#### VCAA approach to General Achievement Test (illustrative)



#### NESA approach to HSC Minimum Standard Test (illustrative)



It is recommended that the VCAA examine the NESA processes to determine whether they are more fit for purpose than the one currently used in Victoria.

### 7.5. Undertake a first-principles review of all critical and high-volume processes in the organisation by increasing the use of technological tools and management of risk parameters

Some VCAA processes have been analysed by this Review and the work of the Independent Monitor. Actual practice, as has been noted in specific recommendations, tends to be characterised by complexity, asymmetric risk management and variability in execution.

In some instances, technological constraints give rise to the manual and complex nature of the processes. This is particularly the case with processes that interface with the Assessment Processing System. However, often the complexity is embedded in the VCAA's processes rather than the technology used.

'Risk management is not well understood at the management level. While managers engage with risk intuitively, there is no systematic approach to recording, reporting, or managing it.'

Public submission

This Review recommends that the VCAA review all critical and high-volume processes in the organisation with the objective of:

- identifying absent process steps and creating a pathway to close these gaps

- applying an external perspective to test risk management processes, considering where risks or compliance are under-managed, for example, in ensuring appropriate use of Kiteworks for sensitive materials, and where risks are over-managed, for example, ensuring that school audits are not critiqued for typographical errors through an editing process. Risk mitigation should be appropriately adjusted for the potential impact on students and teachers
- eliminating excessive steps particularly ‘validation’ or ‘checks’, which in practice are often sign-offs to distribute accountability rather than assessing the content with an expert lens
- identifying opportunities to introduce technological solutions, particularly commercial, ‘off-the-shelf’ products rather than customised, purpose-built systems or ones adapted for the VCAA. For example, the triaging of helpdesk queries could be managed by CRM with in-built analytics
- identifying where technology is not being utilised to its fullest potential, ensuring that available efficiencies from technology are embedded into processes, and staff are adequately trained and supported to use them
- ensuring that processes are designed to be delivered in a standardised way, for example, ensuring that process steps do not rely on assumed knowledge or are defined ambiguously to allow for individuals to deliver according to their own understanding and preferences.

It is also recommended that changes implemented through this process review have a clear change management plan that includes consultation with staff regarding the rationale for the change, the timelines for implementation, support available to them and how they can provide feedback on what is working or not working.

Leaders should err on the side of over-communicating given the perceived lack of transparency, and the volume of change in the organisation. Leaders should also be clear about the outcome expected from the change, how and when it will be measured, and share this with staff.

## 7.6. Critically assess the distribution policy for examination marking guides

The review into the examination problems of 2023 undertaken by Dr John Bennett stressed the importance of publishing the examination marking guides for Mathematics studies in a timely manner. However, guides are not published for all subjects. Three peak bodies and several teacher submissions have raised this as an apparent inequity, with teachers not having access to examination marking guides unless they themselves are assessing the examinations for that year. While assessors receive examination marking guides, other teachers only receive the Chief Assessor’s report – a much less in-depth document, which is delivered months after examinations.

‘The assessment guides (i.e. the marking schemes used by VCAA assessors) for VCAA exams are not publicly available... This disadvantages teachers who have not marked VCE exams before .... Students are also significantly disadvantaged if they do not have an experienced exam-marker as their teacher – they do not have any clarity regarding the allocation of marks for exams, hindering their learning and improvement.’

Public submission

‘Teachers ... need holistic marking explained, so that they understand how work will be marked in the exam, and how that applies to marking assessment tasks in the study design.’

Public submission

Assessors are typically VCE teachers, with processes in place to ensure that they are not assessing their own students and to preserve the anonymity of all students throughout the process.

However, not all VCE teachers who wish to do so are able to undertake assessment responsibilities due to the significant time commitment involved. They consequently have less information about the subject than those who have the capacity to act as assessors.

Accordingly, this Review recommends that the VCAA review its policy in relation to the release of examination marking guides with the objective of providing them, in their most detailed form, to all VCE teachers in a timely and secure way after the conclusion of examinations.

#### 7.7. Establish thresholds for curriculum review cycles based on subject need and explore the potential for review categories that put boundaries around time and effort

There has been a recent change to VCE curriculum review cycles in Victoria, which eliminated the previous mandate of 5-year review cycles across all subjects.

In F–10, a major review of the Australian curriculum acts as a default trigger for Victorian curriculum review, as has been the recent case with version 9 of the Australian Curriculum. However, with regards to VCE subjects, the lack of a specific policy on the frequency of review cycles has been cause for concern among some of the curriculum managers. It is undesirable that the outcome of eliminating the uniform ‘default expiry’ of curricula leaves the frequency of such reviews in the hands of curriculum managers alone.

Curriculum reviews are a time-consuming, multi-year process, which commences with broad consultation and concludes with phased implementation. Each review affects hundreds of teachers who may have to update what they teach and how they teach it. There should consequently be clear policy underpinning the initiation of reviews. In other jurisdictions, including NSW, the time between reviews ranges from 4 years to decades, depending on the nature of the study.

The VCAA should develop clear criteria and a documented process for the initiation of reviews, with the process of initiation overseen by a relevant executive and Board-level committee. Criteria

should consider study design relevance and changes in the knowledge environment since the previous review, changes in methods of teaching and assessment, opportunities to streamline and remove redundancy or duplication, and effectiveness of areas of the current study design based on an analysis of audit findings, teacher feedback and assessment performance. The process for the initiation of a review should be endorsed by the Board, with an objective to balance the quality of curricula for Victorian students with teacher workload and efficiency of the VCAA.

‘A lot of content is vague and unclear. This necessitated a substantial frequently asked questions document provided by VCAA months after the roll out of the study design. Since then, 2 more versions of this document have been provided. While these documents were intended to address the lack of clarity in the study design, in some cases, they just muddied the water further, causing a lot of frustration among teachers, who were forced to reteach content... and certainly damaging confidence and trust in the VCAA curriculum developers.’

Public submission

‘Teachers are left to hunt through multiple documents to piece together the expectations, which is both frustrating and inefficient.’

Public submission

## Recommendation 8 – Continue strengthening examination processes end to end with a focus on stronger process management in the early stages and enhanced integrity controls

In our first report, we recommended strengthening the project management capabilities in the end-to-end examinations process. The early stages of progress are evidenced in the examinations unit's adoption of the project management tool Asana and uptake of project management training. The determination not to repeat the challenges of 2024, and the willingness to introduce process changes, are largely apparent across the unit. This extends to the Assessment and Reporting Division, which has also undertaken steps to anticipate potential challenges and put in place protocols to manage them.

### 8.1. Create a single point of accountability for each examination

Despite progress being made in the point-accountability for different steps in the examination process, with action owners and executive sponsors tracked within the Asana project management tool, the lack of a single point of end-to-end accountability continues to be a problem.

Many issues can arise during handover points between different people in the examination development process. A single examination will involve dozens of people, ranging from examination panel members to different reviewers, editors and designers. As flagged in the first Review, clarifying the accountabilities of each role in the process and what they are signing off is critical. However, relying on the aggregated product of many roles to add up to an error-free final examination remains a residual risk.

There also continue to be a significant number of staff, without subject matter expertise, who have examination sign-off responsibilities.

This risk would best be ameliorated by having a single exam 'owner' with subject matter expertise accountable for signing off each examination – their sign off assuring that all appropriate experts have had input into the examination, the examination reflects the study design, final reviews have been conducted for errors, and the examination reflects a high-quality process.

The transition to identifying people who can fulfil the 2 roles of single exam owner and subject matter expertise may take several examination cycles. In the interim, the VCAA should draw on the expertise of all its staff including examination development managers, curriculum managers and panel chairs to fulfill this role.

### 8.2. Further clarify accountabilities and input requirements in the examination development process

An ongoing point of tension, which appears to have been exacerbated by the significant process changes recently undertaken, is the lack of clarity for different roles in examination development. Attempts to remedy this have sometimes been met with passive resistance and, as deadlines draw near, many have reverted to previous practices. This has created variations in how decisions are made across different examinations. The risk of conflicting views on who is empowered to make decisions is that it can create delays in examination timelines.

This Review recommends that role clarification includes, as a minimum, these points of accountability:

- examination development managers are accountable for ensuring that all necessary steps in the process are undertaken, including critical checking and sign-off steps, and that timelines are maintained
- curriculum managers are accountable for ensuring that the examination conforms with the study design at all substantive development stages – not just the beginning and end
- editors are accountable for language conventions and accessibility.

Points of conflict will naturally arise in the interpretation of these accountabilities – for example, an editor's recommendation for accessibility may conflict with the technical language embedded in the study design, or a panel chair may disagree with a curriculum manager's perspective on a question's validity where the study design is less explicit. The first step should be to find a commonsense resolution to these conflicts – such as alternative wording or using a back-up question. Where there is an impasse, the decision should ultimately be made by the executive overseeing examinations, who may draw on different resources, including other experts, or require a different action such as rewriting a question to resolve the issue as needed.

### 8.3. Improve panel recruitment and onboarding processes

The panel recruitment and onboarding process is often where challenges begin in the examination development process.

Panel recruitment is a large-scale appointment process with significant implications for the examination development process. While implementing a refreshed hire-to-retire process with the structure outlined previously, it is recommended that the process addresses the following areas.

#### Panel appointments should normally be for 3 years

The examination panel appointment process has, in the past been undertaken annually. Our analysis indicates that up to 70% of sessional appointments are re-appointed the following year. In the current year, the VCAA amended the process to 'roll over' contracts, making them 2-year appointments. It is recommended, however, that future appointments are made on a 3-year term with an annual performance-based and compliance checkpoint – that is, the ability to end the contract in the case of underperformance.

This re-appointment process, while streamlining the volume of appointments that need to be undertaken each year, should be designed to ensure that feedback is provided to panel members on their performance in previous years.

We have been advised that some panel chairs were reticent to give feedback to other panel members but then expressed surprise at re-appointments of less well-performing panellists. Feedback for panel members and for chairs is an important opportunity to cultivate the skills of panel members.

## Improve the management of the talent pool of panels

The ability to fill panels with suitably qualified members without real or potential conflicts of interest is an annual challenge for the VCAA. In some circumstances, the pool of available candidates is low. This is particularly the case in some small studies with relatively few teachers, given the requirement that panel members are not currently teaching VCE subjects but are familiar with the curriculum.

While this is true for some cases, and curriculum managers and exam development managers report the need to 'rely on individual networks' to 'tap applicants on the shoulder', this Review recommends that the VCAA pursue more opportunities to act more systematically to cultivate a talent pool for each subject.

Advertising of roles is done through a blanket process on the VCAA's Sessional Staff Management System and utilising other forms of mass communication. A better targeted communications approach could include more active recruitment steps such as regularly engaging with peak bodies to identify suitable prospects, personalised approaches to teachers currently teaching VCE subjects to ensure they are aware of the opportunity when taking parental or other leave, and cultivating partnerships with universities to identify suitably qualified academics.

The VCAA should also have a 'pipeline' way of managing talent more deliberately. High-performing assessors should be identified and flagged as future candidates for examination panels.

Currently, there is an external perception that opportunities to be employed by the VCAA can only be attained by being 'tapped on the shoulder by your network'. Unsuccessful applicants, particularly those in latter stages of an appointment process, should be provided brief feedback on their interviews to enable them to demonstrate these criteria in future.

'Highly qualified and experienced colleagues in other schools have reported that their principals have prevented them from participating in assessments... [while] the private schools view assessment participation as a badge of honour.'

Public submission

Finally, there is a significant challenge in ensuring teachers in government schools are able to take on roles as sessional staff, including in examination panels. The Catholic and independent sectors typically have capacity to provide teachers with leave to participate in panels. By contrast, government schools, even with casual relief teacher payments, struggle to create these opportunities for their staff. The VCAA should partner with the Department of Education to identify further incentives to support public school representation. Such incentives could include contribution to professional development requirements or higher banding.

## Improve panel onboarding processes

Panel induction is not sufficiently comprehensive to ensure panel members understand their roles. The current induction received by all panel members is limited to a panel training webinar and not all panel members were appointed at the time of this being hosted. Some examination panels – for example, mathematics areas – have been provided with training on item development, but others have not. The extent to which expectations of 'what good looks like' is conveyed to panel members

in this process is unclear. We understand that, from 2026, the VCAA intends to amend its panel member induction process.

This Review recommends that such a process should include:

- expectations for the performance of panel members (in terms of availability, participation and quality of outputs)
- an introduction into VCAA administrative processes and mandatory requirements in the examination process – including departmental emails, use of security tools such as Kiteworks and DataLocker, and the measures used to validate compliance
- guidance on assessment development principles and how to develop high-quality assessment items
- the examination development timeline, including an overview of the steps and downstream impacts if timelines are not met.

These expectations should be conducted in addition to the current practice of reviewing the previous year's examination and how students performed on various aspects.

#### 8.4. Reset timeframes in the examination development process, including strong commitments to achieving key milestone dates

Managing the examination process using the Asana project management tool has required some approximation of interim deliverables between hard dates, such as the commencement of the printing process, which cannot be moved. This included, for the first time, the timeline for managing the alternative format examination papers for students with special provisions. The VCAA has already planned continuous improvement to the process used this year, and this Review supports the important steps of reviewing timelines and reporting structures.

An enhanced process should also consider potential bottlenecks – particularly in the production and editorial stage of examination development. There is production and editorial capability scattered across different pockets of the business, including in curriculum areas. A pooled capability where these resources are functionally aligned to their area but all work on examinations during a dedicated 'blackout' period may be useful in supplementing the workforce. Additionally, changes to upstream processes – such as drafting in a format more conducive to downstream design processes – should be implemented to ease these bottlenecks.

Additionally, as processes mature, key milestones that involve external stakeholders should be relatively locked in to support the examination timeline.

#### 8.5. Address security and integrity weaknesses in the examination development process, including conflict declarations and information handling

Within the VCAA offices, examination security is tightly managed. For example, the examinations area is 'walled off' and staff with potential conflicts of interest, such as a child completing the VCE, are not allowed to access certain areas or sensitive documents. However, when engaging with sessional staff – specifically panel members – multiple security issues persist.

Examinations are not currently developed in a live, secure space. A master document is housed in one application, Kiteworks, and downloaded onto secure DataLocker USBs, which require two-factor authentication and can be remotely wiped. This process relies on panel members uploading files in the DataLocker and not on their hard drives. In this process, it is possible to validate the downloads from Kiteworks and use of the DataLocker. However, it is not possible to validate whether staff download items onto their hard drives.

A further issue is the conflict-of-interest management process. The conflict-of-interest check process is a self-declaration combined with explicit validation of criminal history and active teaching registration. However, declaring conflicts including close contact with students undertaking VCE, operating a related business (such as tutoring, or development of textbooks), or undertaking related activities on a commercial basis (such as participation at paid-for panel events) rely on individual self-declaration.

Self-declaration is a reasonable identification method, but not a method of assurance. It is apparent that not all panel members are fully aware of what constitutes a conflict of interest, often resulting in such conflicts only being identified when the VCAA is notified by an external stakeholder.

To ensure the integrity of the examination development process, there needs to be very clear expectations, guidelines and consequences articulated to panel members. The requirement to use DataLockers or similar system and accurately declare conflicts of interest should be unambiguous and fully understood prior to any activity commencing.

Appropriate technical personnel support should be in place for panel members to ensure that they are able to comply with these requirements. There also should be a process for validation that relies on more than self-declaring.

It is also recommended that a random audit process is put in place and communicated to panel members. The VCAA, consulting with the Board, should establish a framework for management of non-compliance. Additionally, the VCAA should undertake a cost-benefit analysis of the potential to shift to a technological platform that only allows for examination development to happen within the platform, without the ability to download.

## 8.6. Revise the special provisions process to streamline handling

Special provisions can include, but are not limited to, alternative format examination papers that are published by the VCAA (large text, braille), rest breaks and extra working time, separate rooms and assistive technology. Applications for special provisions have increased by almost 80% since 2020.

Special provisions requests have now exceeded 11,000 applications, with approval rates typically exceeding 95% for different categories of qualification. Special provision panels make these determinations, with administrative workload undertaken by the current Assessment and Reporting Division. The administrative workload is growing, particularly in reviewing free text fields for almost half the applications. The current process is also seen as difficult for many schools to navigate, giving rise to unnecessary delays and potential equity concerns.

‘Delays, denials, and uncertainty surrounding Special Examination Arrangements (SEAs) place a significant psychological toll on students with disabilities and Specific Learning Difficulties (SLDs) and their families. For students already navigating the challenges of a learning disability, the added stress of awaiting or appealing SEA decisions can trigger heightened anxiety, reduced self-worth, and disengagement from school.

Families routinely report emotional exhaustion and frustration, often describing a sense of abandonment by the education system.’

Public submission

‘Despite government schools having dramatically lower levels of advantage, VCE students in these schools were much less likely to be provided with Special Examination Arrangements (SEA) or with Derived Exam Scores (DES)... Two-thirds of the teachers surveyed agreed that [this is because] special provision was difficult to implement at their schools due to inadequate staffing levels.’

Public submission

There are clear opportunities to further streamline the process. This could include increased templating of responses to reduce the amount of free text input from schools. More broadly, as flagged by several submissions from representative bodies, providing 2 application periods – one early in the year and one later – is desirable.

For many special provision requests, the need for special arrangements is known by the school well in advance of VCE – for example, supporting students with learning disabilities from Year 7 or in the case of physical impairment. In these cases, evidencing long-standing conditions earlier can rely more heavily on documentation of historical school-based arrangements to support these students.

Specific decision rules could be developed to expedite a process that already has extremely high approval ratings; the need for particular formats could be planned in advance and the workload staggered over 2 periods rather than creating one large surge. Importantly, such changes would create greater certainty for these students in a challenging year.

Other jurisdictions are responding to similar challenges. In NSW, 15.4% of HSC students applied for special provisions in the 2024 HSC examinations. In response, the NSW Education Standards Authority has recently commenced a review of HSC disability provisions that is likely to identify opportunities for process redevelopment. A similar review should be considered in Victoria.

The development of alternative format examination papers also consumes significant resources, in part due to a lack of guidelines provided by the VCAA about what formats will be available.

To streamline the examination development process, it is recommended that the VCAA draw from the practice of other jurisdictions such as NSW, which allows schools to apply from a list of approved alternative format examinations.

## Recommendation 9 – Establish a clear technology roadmap with priority focusing on the most critical operational risks

The VCAA's technology landscape is a significant limitation on its efficiency and effectiveness. It uses multiple systems to undertake its core activities, many of which are bespoke, not well connected, outdated or carry significant risk. There is no strategy for the organisation's technology requirements. As a result, new systems or features have been introduced that often conflict with existing business processes, do not consider the needs of users, or require manual workarounds to complete their intended function.

In short, technology is not an enabler of the organisation's activities and needs urgent remediation.

This Review has examined the VCAA's 2 broad categories of technology: its assessment applications and enabling systems.

Assessment applications include crucial systems for registering students, managing enrolments, marking examinations, hosting assessments and conducting data analytics and reporting, including the communication of results. Enabling systems are those that facilitate the management and delivery of work such as file-transfer platforms, finance and payroll management systems, and service desk tools.

Given the VCAA's very large casual/sessional workforce, the sensitivity of the data it shares with its staff, and the very large number of stakeholders it interacts with, the importance of these enabling systems must not be overlooked.

Each of the VCAA's more than 25 operational systems has its own unique deficiencies and challenges. It is beyond the scope of this Review to catalogue each or to chart a detailed path forward. However, it is clear that the VCAA needs to establish, as a matter of priority, a technology roadmap to underpin its operations. This roadmap should outline a desirable architecture for its assessment applications and enabling systems and a preferred pathway and timeline for migrating from or improving the incumbent systems to meet that vision. These transitions will not be without cost and risk if not well managed.

However, it is evident that significant efficiencies could be realised through better technology. Three examples follow.

- Approximately 340,000 hours of school time is spent manually entering and then quality assuring student information stored in VCAA systems, which generates more than 50 calls per day from teachers to VCAA for support.
- A team of 3 staff manually review more than 11,000 applications for special provision that are lodged in virtually free text, making it very challenging to apply business rules and decision-support tools.
- Substantial rework (and associated costs for casual employees) when exams need to be rewritten as a result of files not being kept secure.

The limitations of existing, sometimes obsolete, and disconnected systems and the potential efficiencies to be gained would provide the basis for a business case for investment in improvements to the technology platforms used by the VCAA. A detailed cost-benefit technology roadmap should be a necessary precondition to government funding.

In the sections below, we discuss priorities and recommendations that the roadmap should build upon.

### 9.1. Strengthen the governance and strategic direction of the VCAA's ICT landscape

The VCAA's technology strategy, governance and oversight has been a root cause of several of the organisation's challenges. When asked to explain its technology strategy for the purpose of this Review, the VCAA could only provide an external consultant's report from 2022 with no evidence of progress against recommendations, with the exception of establishing a Chief Information Officer position.

In addition, the VCAA was unable to provide a clear 'current state' assessment of its systems and applications or its vulnerabilities and priorities for investment.

'For many years I have been asking what our work/project priorities are and who is responsible for making the call. We often have competing work priorities for projects.'

Public submission

Its governance processes are also nascent, with a management-level information management technology governance committee only recently being established. At time of writing, the committee still lacks formal terms of reference and consistent attendees.

The consequences of this lack of governance and strategy are clear to this Review. Some examples include:

- a project to address the known challenges with the Victorian Assessment Software System has been continually delayed
- as noted above, a platforming decision for the Digital Assessment Library (DAL) was made and then reversed after significant sunk cost
- the VCAA is still running parallel marking platforms (VCAA Online Scoring System and E-Mark) with no clear logic or pathway forward to determine whether it should invest only in the capability of its in-house platform or retain its dual-system approach
- IT projects are insufficiently governed and accountabilities between the various IT teams across the business are unclear. Consequently, projects get delayed, at significant cost, or occasionally launched with errors. This was the case with the initial eduPay implementation, which led to manual workarounds and user-support calls at significant cost and distraction
- Asana was selected as the preferred workflow management tool for examinations with limited engagement with the Department of Education. This Review has since been advised that the Department of Education is likely to adopt a different workflow management tool, creating challenges in the management of 2 systems within the same network environment.

Finally, IT teams in the business do not appear to have an adequate ‘customer-focussed’ mindset necessary to enable the business to work effectively. Similar to other parts in the organisation, siloes and traits that appear combative have degraded the function’s effectiveness.

In summary, much stronger governance, a clear strategic direction, and a customer-focus on enabling the business as much as possible will be essential in the future.

## 9.2. Fund and resource remediation of the most vulnerable operational systems, commencing with the Victorian Assessment Software System

Of VCAA’s aged systems, the Victorian Assessment Software System (VASS) appears to be the most vulnerable and the most urgent priority for remediation. Originally built in 1995, VASS is the system for registered schools to input enrolments and school-based assessment results for senior secondary students.

These data are essential for several purposes including tracking results and enrolments, determining how many assessments to print, deliver and mark for each school, and for calculating assessment marks that contribute to ATARs and study scores.

The system was designed 19 years ago to be accessed on Internet Explorer – a web browser that is no longer supported by its vendor, Microsoft. To access it, teachers and VCAA staff must use a workaround within the more modern Microsoft Edge web browser. However, Microsoft has now indicated that this workaround may not be supported after 2029. It has a confusing user interface that makes it prone to data errors, and there are concerns about its ongoing cyber security given its broad user base and connection to other crucial systems.

‘Upgrade VASS to a stable, multi-platform environment that reflects 2025 — not 2005. Eliminate the need for compatibility workarounds and reduce data-loss risk.’

Public submission

These issues are known to the organisation, which commissioned the VASS ‘Cross-Browser Project’ in 2019 to provide schools with the flexibility to run VASS across multiple internet browsers and operating systems. However, due to changes in organisational priorities between 2020 and 2024, resources earmarked to the ‘Cross-Browser Project’ were instead diverted to several other initiatives including the VCAA’s response to COVID-19, implementation of the still-incomplete Human Resources reforms and the development of the Student Portal.

While this project has now recommenced, aiming for completion by 2028, this delivery date is at risk due to competing demands, insufficient organisation-wide project governance, and the need for an additional \$1.2 million in delivery resources over 2 years.

The technology roadmap should identify a remediation plan to complete VASS’ re-platforming as a matter of priority, so that it can be delivered before 2029 when the Microsoft support risk may materialise. Importantly, given VASS is at the heart of many business operations, the remediation plan needs to be consistent with the rest of the technology architecture to prevent the creation of future challenges.

9.3. Identify an appropriate timeline for the retirement and replacement of complex systems, particularly the Assessment Processing System

The technology roadmap should also outline an appropriate timeline and approach for replacement of other complex core systems. Notable systems include:

Key systems/platforms requiring a modernisation pathway

System	Description	Current challenges
Assessment Processing System (APS)	APS is a 30-year-old system that supports the VCAA’s assessment and reporting processes. It tracks enrolments, works out the number of assessments to print and deliver, tracks assessments and receives marks, conducts statistical moderations and undertakes other reporting functions.	While broadly functional, it is a specialised system that is not easy to learn and use. Users often encounter issues, and some activities need manual workarounds. It is also inflexible, which was a significant detriment during the 2024 incident when APS could not ‘discard’ the incorrect exam papers, necessitating a manual workaround that was not wholly effective.
Special Provision Online (SPO)	SPO provides a portal for schools to apply for special provisions. While schools are encouraged to select between common provisions (for example: braille, large text) the system allows free text inputs in case of bespoke needs.	The system is broadly functional, and some improvements could be made with basic business rules (for example: to greatly reduce use of free text fields). Longer term, however, growing numbers of system problems and operational policy changes mean an evolution of the platform would be warranted.

System	Description	Current challenges
VCAA Online Scoring System (VOSS) and Pearson E-Mark	VCAA uses 2 systems to facilitate the marking of exams: an in-house system called VOSS and a commercial provider's (Pearson) proprietary platform, E-Mark. Both assign student scripts to markers and conduct statistical checks to aid in scoring.	VOSS is not trusted to process all exams given prior system crashes, as it could not handle all scripts. E-Mark was used to supplement capacity at the time and has some additional capability. However, there is no strategy that guides whether a dual-platform approach is desirable, which likely leads to higher costs and lost capability. This is despite VOSS now theoretically having the capability to handle all scripts including high-volume English and Mathematics.
Kiteworks and DataLockers	Kiteworks (a system) and DataLockers (secure USB drives) are used in conjunction to allow exam drafters and contributors to securely access and edit scripts. They are an important data-security control to prevent inadvertent access to draft examinations.	The current approach is flawed, with reports that a significant number of DataLockers have not been used and several examples of scripts being downloaded onto personal hard drives or emailed, against protocols.  The approach to script sharing was devised around 8 years ago before in-built Microsoft sharing tools (i.e. SharePoint) had matured to their contemporary capabilities. It is likely that adopting SharePoint would lead to better controls and greater efficiency.

#### 9.4. Assess potential to transition IT systems to off-the-shelf commercial solutions and leverage Department of Education capability where appropriate

A key feature of VCAA's current technology landscape is the use of bespoke, on-premises systems. Contemporary technology strategies typically advocate the use of cloud-based and commercial solutions. This is because they can easily scale up, are often cost effective, are regularly updated and supported by their vendors and offer enhanced security and reliability.

There are opportunities to consider moving technology systems to commercial solutions for several of VCAA's applications. Pearson's E-Mark is an example of a commercial solution being used successfully by the VCAA in parallel with the bespoke VCAA Online Scoring System. Other potential applications include the Victorian Student Register (a database which stores student numbers).

The technology roadmap should make clear recommendations for migration to either commercial solutions or maintenance of bespoke builds for each of the VCAA's technology solutions.

These decisions should be made in conjunction with the Department of Education to leverage its scale and capability where possible. We understand the Department of Education is currently developing its master data management protocols, which would likely be a suitable tool for management of Victorian Student Numbers.

#### 9.5. Introduce integrated commercial workflow management tools and provide comprehensive training to staff

The VCAA has few enabling systems with the specific intent of making the work of VCAA staff easier. Where systems for workflow management have been introduced, such as the initial introduction of Asana for the project management of examinations, there was little support and training for staff in how to best use them to make work easier.

Only this year, when Asana became a critical enabler of the examination process, was this deficiency remedied through a training partnership and system configuration. Such training is the exception, rather than the rule.

In many functions, there exists little to no technology support at all. Examples identified by this Review include:

- staff need to build their own file structures on internal drives rather than utilise modern document management protocols. This means files are very difficult to find for new employees and there are significant version-control risks
- basic data analytics and visualisation tools, such as PowerBI, have been very difficult for staff to access, necessitating the use of outdated software, which is harder, and takes much longer, to use
- despite having thousands of stakeholders and fielding tens of thousands of enquiries every year, the VCAA has no CRM software to ensure it engages with its stakeholders in a structured way. It has no way of building a single picture of a stakeholder's concerns or even tracking who its stakeholders are.

'When I worked at VCAA there was no dedicated CRM, which meant that each team oversaw their own inbox. This led to many questions being missed and not followed up due to the manual nature of handling these types of inquiries.'

Public submission

A new system is not going to be a panacea to the challenges we have observed at the VCAA. However, it is evident that the technology roadmap needs to outline how improved workflow management tools make it easier for VCAA staff to do their jobs, reduce risks in processes, and improve efficiency. When those new tools are selected, the VCAA should involve the staff who will use them in their selection and configuration. Proper training must also be provided to ensure the benefits are properly realised.

## 9.6. Resource capability and establish partnerships to identify applications of Artificial Intelligence in the works of the VCAA and develop appropriate governance arrangements to support applications

Many curriculum development authorities, assessment organisations and educational institutions are investing in the appropriate use of Artificial Intelligence (AI) in their work.

There are several tasks and functions undertaken by the VCAA that might be appropriate for the use of AI. These could cover both the core functions of the VCAA – curricula development and examination development and assessment – as well as its broader functions and engagement with its stakeholders.

For example, AI could be used to:

- prepare personalised, draft responses to teacher queries, drawing on the VCAA's internal knowledge banks, which can be checked by VCAA staff before being sent, saving time
- streamline and improve the consistency of school audits, which are a time-consuming task conducted with significant variance in approach depending on the individuals who conduct them
- act as an assistant in the preparation of internal briefing papers with the chat interface allowing staff who are not expert in the 'art of briefing' to speak in plain language while the AI Agent builds the brief in the background, improving the quality of briefing and the time taken by staff to write them
- prepare additional, customised guidance material following the release of a new study design to assist teachers to implement it in the classroom
- conduct quality assurance of examinations by considering alternative interpretations or checking for spelling or grammatical errors to prevent the 'groupthink' that comes from having those who are very close to an issue be the only ones looking for alternative ways that a problem might be interpreted.

It is acknowledged that, in the current climate, the use of AI in a sensitive area such as learning and examinations must be done cautiously. Fortunately, Victoria has some of Australia's leading research institutions in AI and it would be prudent for the VCAA to partner with them to design appropriate pilots and to implement the necessary governance and safeguards.

The technology roadmap should identify potential areas for investigation and determine the nature and extent of investment the organisation may seek in order to establish partnerships to pursue them. The ethical use and governance of AI in the pilot should be consistent with the Victorian Government Generative AI Guideline.

### **Interjurisdictional case studies:**

**South Australia:** The South Australian Department of Education is leading Australian jurisdictions in the ethical integration of AI into curriculum and assessments. In particular, SA have sought to reduce teacher workload and support curriculum implementation through commissioning of the EdChat chatbot to support lesson planning, summarise data and adapt materials for the curriculum. Beyond these applications, the tool was used to assess student proficiency in the case of helping mark the SA Learning English: Achievement and Proficiency test for recent migrants. This tool was successfully able to mark each test in under a minute, a task which generally takes over half an hour, significantly reducing teacher workload. Having been trialled by more than 10,000 students, EdChat is being rolled out to all SA public school staff in 2025.

**New South Wales:** NSW's Department of Education has commenced a pilot roll out of NSWEdUChat, which can help automate administrative tasks for teachers, giving them more time to focus on personalised learning and student interactions.

**New Zealand/Aotearoa:** The NZ Ministry of Education is currently in the process of implementing AI support for the marking process of one standardised assessment, which includes marking of essay-based questions. Following a successful trial, this has moved into phased roll out for 2025.

**Singapore:** Singapore's Ministry of Education uses AI to directly improve student learning experiences through its online learning platform called the Student Learning Space. This tool provides online curriculum-aligned assessments for primary and secondary students, similar to the DAL, but also uses AI to provide students instant feedback on their spelling and punctuation. As a result, teachers can focus on helping students with more complex tasks, such as providing feedback on vocabulary and tone.

## Recommendation 10 – Reset external stakeholder relationships and strengthen the focus on external ‘customer’ needs

### 10.1. Create systemic mechanisms for identifying and responding to issues raised by teachers and other stakeholders

The VCAA is an organisation that is rightly proud of its expertise. However, a consistent theme in many of the public submissions we received was that external stakeholders are viewed as impediments rather than important partners in the delivery of educational outcomes to students.

‘We think of collaboration as consultation... and treat consultation as a tick-box exercise before [we] can do what [we] want.’

VCAA staff workshop

The VCAA’s current senior management has acknowledged that it needs to improve the way it engages with stakeholders including other public sector agencies, representative bodies and industry groups. It should:

- deepen its understanding of who its stakeholders are by, for example, developing and maintaining a register
- establish a framework for how it will engage with these stakeholders in relation to different topics. The IAP2 Spectrum of Public Participation may be a useful tool to categorise different levels of engagement depending on the topic
- adopt a mindset of genuine interest and curiosity in the input of others
- communicate with stakeholders by clearly outlining how their input was used in decision-making.

### Engagement with schools and students

Our first report highlighted the inadequacy of communications with schools during the 2024 examination problem. Both submissions and peak body engagement attested to the operational toll on schools as well as the emotional toll on principals, teachers and distressed students from the lack of timeliness and transparency in the VCAA’s communications.

‘Principals were expected to maintain confidence in a system that had offered none in return.’

Public submission

‘Students engaged with the Victorian Student Representative Council (VicSRC) repeatedly reported a lack of awareness and information about assessments and academic pathways from the VCAA. While this information may be available online through the VCAA website and social media page, students note that these sources of information are not currently accessible or engaging for them.’

Public submission

One important avenue to rebuilding trust will be resetting how the VCAA communicates with schools in the future.

Communication with schools – particularly during the high-pressure examinations period – should follow a set of basic principles:

- communicate early with accurate information
- be clear about when the next set of communications can be anticipated
- provide guidance for addressing student and parent concerns – for example, that there are established practices for making sure that examination outcomes are fair
- involve stakeholders in shaping communications as much as possible – consider establishing a trusted advisory committee of principals and teachers to test and refine messaging
- provide equitable channels for follow up, ensuring that no stakeholder has privileged access to additional information than others.

This should be captured in a communication policy and form part of a crisis management protocol.

### Engagement with teachers and subject matter associations

A consistent theme from some external stakeholder feedback, particularly teacher submissions, was the lack of consideration and responsiveness demonstrated by parts of the VCAA when engaging with them.

Stakeholders used many different words to describe the attitude, but we summarise it as ‘command-and-control’. Teachers particularly felt that the VCAA has been indifferent to the realities experienced in classrooms and the challenges posed by certain changes to the curriculum that have significantly added to teacher workload.

Internally, it has been recognised by some VCAA staff that consultation with external stakeholders is often undertaken as a mandatory exercise rather than an openness to using the feedback for making substantive changes. In any setting, but especially against a backdrop of a teacher shortage, the VCAA should demonstrate that it recognises and considers the experiences of teachers who deliver the curriculum day to day.

‘The audit process makes me feel undervalued and when teachers are in short supply, VCAA need to be giving more support through the development of curriculum... It is disheartening when we are not trusted as professionals.’

Public submission

An example of a feedback mechanism that has been implemented successfully in NSW is the ‘Have Your Say’ feedback period of 6 to 8 weeks available to teachers when new curricula are first published. The feedback collected by the survey is then used to inform final revision before publication.

The VCAA has a ‘consultation register’, to which any teacher can sign up, to provide feedback on draft study designs. However, to date, this register has not been widely utilised. Future revisions to this approach should consider how the VCAA can simplify the process of feedback (for example, allowing all teachers to provide open-ended feedback) and promote it more widely, drawing lessons from other jurisdictions such as NSW.

More routinely, the VCAA should establish thresholds for the internal review of curricula based on teacher feedback. There is a range of options available to the VCAA in responding to feedback ranging from issuing supplementary guidance and sample materials to clarifying how some learning areas would apply in a classroom setting or bringing forward a revision of the subject.

There also needs to be a more consistent standard for engaging with teachers to provide them support. When this Review surveyed curriculum manager workload, feedback indicated that, while some curriculum managers spent a large proportion of their time responding to teacher queries, others saw it as not being a material part of their workload.

An orientation towards ‘customer service’ needs to be part, but not all, of the many roles in the business, particularly curriculum managers. The Board and CEO should play an essential role in setting the tone for enhanced customer service.

## 10.2. Seek to broaden the diversity of backgrounds and experiences of staff appointed to the VCAA

Teacher submissions and the experiences of some VCAA staff attest to a disconnect between how the VCAA conceptualises what should be taught in schools and the realities of teaching in different environments – specifically those schools with fewer resources, such as regional schools and those in lower socioeconomic areas. This is not only relevant to curricula development, but the entire support system that the VCAA makes available to teachers – from planning support, teaching resources and sample materials to engagement pathways for teachers who may lack access to peer support, conferences and other mechanisms.

'VCAA appears dominated by private school staff, and curriculum is designed for private schools with far greater time allowances for subjects .... the expectations of content schools are able to cover from 7 through VCE are beyond unrealistic for the government school sector. There is a lack of understanding about how under-resourced and time-poor government schools are, and how many classes teachers have to teach...'

Public submission

The VCAA's key objective is to enable Victorian students to attain an education that meets a global standard. This should sit alongside the aspiration that every student has the best opportunity possible to learn: an objective that requires the VCAA to fully understand how curricula and examinations come to life in different teaching environments and learning experiences. This means recognising that not all teachers are able to attend conferences or purchase commercially produced teaching resources. Improving the VCAA's channels of communication and support materials can help fill these gaps.

One of the best ways for the organisation to adopt a broader view of its teacher and student cohorts is for the VCAA to draw its own employees from a more diverse set of backgrounds, and to expressly value those diverse experiences. This should include teaching experiences in government, independent and Catholic schools from a wide range of socioeconomic backgrounds.

It should also include appointments of staff with skillsets from across the public service, the broader public sector, and from the private sector to inject new 'ways of doing things'.

Behaviours that expressly challenge 'the way we have always done it' should be encouraged, with techniques such as 'teacher personas' (where different teacher profiles are used as a lens for review) adopted to enable more diverse perspectives to be introduced to decision-making. This would ask someone to play the role of a teacher from a regional area, or a teacher working with students for whom English is a second language, to challenge how a decision may impact that cohort.

## Recommendation 11 – Maintain an Independent Monitor for a further 12 months or until the Minister is satisfied that the VCAA has the systems and processes to undertake its functions effectively

At the Minister for Education's request, the Secretary of the Department of Education established an Independent Monitor to provide advice and assurance regarding the VCAA's end-to-end preparation and delivery of the 2025 VCE examinations. The Monitor has been working actively with VCAA staff to assure the examinations, identifying potential risks, and providing support to the VCAA as it mitigates those risks and responds to emerging issues.

Feedback from VCAA staff has highlighted the positive impact of the Monitor as an additional source of advice and assurance for a very complex examination and assessment process.

Given the far-reaching findings of this Review and the VCAA's poor track record in responding to and implementing the findings of prior reviews, we recommend an Independent Monitor remain in place for a further 12 months or until the Minister is satisfied that the VCAA has the systems and processes to undertake its functions effectively.

This role will be particularly important over the coming period with a new Board, newly appointed senior management and the implementation of wide-ranging reforms, all the while ensuring that the VCAA's core functions are delivered to the highest standard.