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FOR THE AUSTRALIAN CAPITAL TERRITORY

STANDING COMMITTEE ON EDUCATION AND COMMUNITY INCLUSION
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Submission Cover Sheet

Inquiry into the Future of School Infrastructure in the ACT

Submission Number: 18

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12 April 2023

Standing Committee on Education and Community Inclusion
ACT Legislative Assembly

By email: LACommitteeECI@parliament.act.gov.au

Re: Inquiry into the Future of School Infrastructure in the ACT

Dear Committee members,

Thank you for the opportunity to comment on the future of infrastructure in ACT public schools.

The ACT Branch of the Australian Education Union (AEU) represents over 4,300 workers in ACT public education. Our views are informed by our professional expertise as educators, our direct experience of working in public schools in the ACT, and our system-wide view of representing a significant majority of workers at every ACT public school.

Our submission is guided by our commitment to quality public education as one of the most powerful levers governments can use to advance social and economic equality. As the workforce delivering the *Future of Education*, we are committed to its guiding principles of equity, student agency, access and inclusion. We know first-hand how infrastructure can help or hinder our capacity to meaningfully enact these principles in teaching and learning.

The inquiry's prompt to consider the future of infrastructure is a useful one, because it asks us all to consider an ideal public education system for the ACT in which every student and every worker is comfortable, healthy and safe. Envisioning such a future guides our submission. In it, we identify current issues and present recommendations for an improved future for school infrastructure.

We look forward to following the Committee's work on this important issue.

Regards,

Angela Burroughs, Branch President

Patrick Judge, Branch Secretary

Table of Contents

Introduction	3
Recommendations summary	4
Ensuring we build on previous work.....	5
Equity across the public school system	5
The need for effective planning and maintenance systems.....	8
Centralise building services.....	11
Ensure system resourcing for system reform	11
Review major upgrades funding process.....	12
Inclusion of all students	13
Safety for teachers, principals, school assistants, and students.....	15
Immediately and centrally fund infrastructure works to reduce violence risk	17
Develop long term air quality plans	17
Improve essential facilities like toilets	18
Ensure safe temperatures in classrooms.....	18
Provide adequate staff accommodations.....	19
Design specifications.....	19
Teaching innovation.....	20
Behaviour management.....	21
Flexibility	21
Understanding needs of school	21
Quality of new builds	22
Capacity issues	22
Digital infrastructure	25
Information management systems that enhance learning and do not increase workload	25
Hardware provision that meets basic teaching and learning needs	26
Adequate technical support.....	26
Consultation and training	26
Measuring success	26
Conclusion.....	28
Attachment A: Tasks that are currently the responsibility of a school.....	29

Introduction

Thank you for the opportunity to comment on the future of infrastructure in ACT public schools.

The ACT Branch of the Australian Education Union (AEU) represents over 4,300 workers in ACT public education. Our views are informed by our professional expertise as educators, our direct experience of working in public schools in the ACT, and our system-wide view of representing a significant majority of workers at every ACT public school.

This submission is guided by our commitment to quality public education as one of the most powerful levers governments can use to advance social and economic equality. As the workforce delivering the *Future of Education*, we are committed to its guiding principles of equity, student agency, access and inclusion. We know first-hand how infrastructure can help or hinder our capacity to meaningfully enact these principles in teaching and learning.

The *Australian Standard on Asset Management* (AS ISO 55000:2014) makes clear that best practice asset management systems are structured, coordinated, and align asset management activities with organisational objectives. These are the core considerations that we bring to this submission.

The inquiry's prompt to consider the future of infrastructure is a useful one, because it asks us all to consider an ideal public education system for the ACT in which every student and every worker is comfortable, healthy and safe. Envisioning such a future guides our submission. We aim for a future of school infrastructure characterised by the following:

- Teaching facilities that are flexible, modern, user-friendly and fit-for-purpose
- Learning conditions that bring out the best in our students, allow every student to be and feel included, make them feel proud of attending an ACT public school, and make families feel like the Government values them
- Meaningful cohesion between organisational aims and infrastructure management
- A school system that is equitable, meaning everyone has an excellent experience regardless of where they go to school or work, and that every site meets a common set of minimum standards
- Infrastructure maintenance systems that effectively use data, keep every asset in good working order, respond quickly to problems, and that allow teachers to teach and leaders to lead
- Schools that are clean, safe, and comfortable

This submission identifies problems we currently experience that serve as obstacles to make this vision a reality. It proposes solutions and appraises current efforts to improve the situation of school infrastructure in the ACT. Our evidence base is first and foremost the experience and expertise of our members, buttressed by research and examples from other jurisdictions.

We do not see that it will be possible to realise an improved future for ACT public school infrastructure without considerable additional investment from the ACT Government. We make notes on possible resourcing needs throughout this document and urge the committee to make a recommendation to the Government that it injects significant additional funding to the Education Directorate in the 2023-24 ACT Budget to achieve a better school experience for every ACT student.

Recommendations summary

1. Ensure that we build on previous work:

Seek updates of progress against each of the recommendations accepted by the ACT Government in *Government Response to ACT Auditor-General's Report No. 11 of 2019 (2020)* and *Government Response to Report No.3 of the Standing Committee on Education and Community Inclusion – Management of ACT School Infrastructure (2022)*.

2. Prioritise equity across the public school system:

Establish comprehensive minimum standards for all school sites, audit all school infrastructure against these standards, and set out a schedule for improvement until all sites reach minimum standards. Report on progress against these standards in annual reports.

Increase ACT budget allocation for Education in line with necessary improvements identified through this process. The audit work and identified necessary upgrades should not be the responsibility of school principals, but of a dedicated team in the Education Directorate.

3. Improve planning and maintenance systems:

Reform budget processes within the Education Directorate so that all repairs, maintenance, upgrades and new builds are funded centrally and undertaken by a centralised building services unit. Provide transparency of decision-making regarding how works are prioritised.

Centralise building services to allow school principals to be educational leaders rather than asset and budget managers. Ensure system-wide reforms have system-wide resourcing for infrastructure implications. Review processes for major works to ensure equity and lower school leader workload.

4. Commit to inclusion of all students:

Commit to fully funding infrastructure upgrades deemed necessary by the 2023 Inclusive Education Strategy, through a discrete and centrally funded program. Consider a whole-of-government approach to this. Adapt universal

design standards from other jurisdictions to complement ACT schools minimum standards. Use this to set a schedule of upgrades so that every school site has capacity for inclusion. Reset budgetary approaches to ensure that schools are fully funded to perform all necessary upgrades.

5. Ensure safety for teachers, principals, school assistants and students:

Immediately and centrally fund infrastructure works to reduce violence risk both preventatively and when an OVRA identifies an environmental control to reduce risk. Develop long term air quality plans. Improve essential facilities like toilets. Ensure safe temperatures in classrooms. Provide adequate staff accommodations.

6. Resolve capacity issues:

Develop a school capacity calculation formula that more accurately represents usage of schools. Respond to existing crowding issues accordingly.

7. Improve digital infrastructure:

Review ICT procurement practices to ensure that these establish and monitor end-user operational requirements and evaluate ICT provision against these requirements.

Conduct a performance audit of systems supporting schools.

Ensure information management systems enhance learning and do not increase workload. Provide hardware that meets basic teaching and learning needs. Provide adequate technical support. Provide adequate consultation for changes and training when changes are made.

8. Measure success effectively:

Set clear objectives for infrastructure management that link to the strategic objectives of the Education Directorate. Report progress against these objectives comprehensively and transparently in each annual report.

Ensuring we build on previous work

In 2019 the ACT Audit Office investigated the maintenance of ACT Government school infrastructure, which was the catalyst for the previous inquiry.¹ The Auditor-General's report made eight recommendations to improve the systems that maintain school infrastructure, based on a forensic analysis of the responsibilities for asset management held by schools and various government areas. The ACT Government agreed to seven of the report's recommendations and agreed in-principle to one. The Education Directorate reported against each recommendation in its 2020-21 annual report, with most actions being marked as 'in progress', subject to reviews or work being undertaken by external consultants.²

Additionally, the previous inquiry on school infrastructure management made 35 recommendations, to which the ACT Government agreed to 22, agreed in-principle to eight, and noted five.

Many findings and recommendations made by these two reports are relevant to the current inquiry's work, and relevant to this submission. We need to make sure we are building on the excellent work that has already been done to identify and solve problems with how the ACT manages and improves school infrastructure.

Given this recent history, we recommend that the current inquiry investigate the progress that has been made against each of the recommendations accepted by the Government over the past three years.

Recommendation 1 – Ensure that we build on previous work:

Seek updates of progress against each of the recommendations accepted by the ACT Government in its *Government Response to ACT Auditor-General's Report No. 11 of 2019 (2020)* and *Government Response to Report No.3 of the Standing Committee on Education and Community Inclusion – Management of ACT School Infrastructure (2022)*.

Equity across the public school system

Despite the *Future of Education* passing halfway through its implementation schedule, we still cannot see equitable provision of education infrastructure across the ACT. Given the diversity of building assets across the system, it is obviously not possible for every school to have identical facilities, but they should be at least equitable in comfort, safety, and ease of use for teaching and learning.

We do not provide an exhaustive list of the issues experienced at each school here, and trust that local P&C communities will make submissions to that effect as they did so well during the last school infrastructure inquiry. Instead, we want to insist here that the Education Directorate has a responsibility, as a provider of equitable education, to establish and commit to a set of minimum property quality standards across its own system of schools. Improvements made after the 2019 Auditor-General report and previous school infrastructure inquiry go some of the way, in having highlighted the dire need for basic building condition information to be systematically stored and

¹ Throughout this submission we make reference to the 'previous inquiry', which was the ['Inquiry into the management of ACT school infrastructure'](#) conducted by the Standing Committee on Education and Community Inclusion in 2021 (report released May 2022). This was in response to the ACT Auditor-General's report ['Maintenance of ACT Government school infrastructure'](#) (report no. 11/2019), released in 2019.

² [Education Directorate Annual Report 2020-21](#), pp. 65-67.

reviewed. But we have not finished the task of providing equitable education infrastructure for all children and young people in the ACT. The future of public school infrastructure should place equity at the start of considerations.

Equity is not just achieved through resource allocation, it is achieved through effective planning that places equity at the core of its objectives. Without a comprehensive set of minimum property quality standards and regular assessments against those standards, the Education Directorate is not able to know where there are problems in its asset portfolio, how much it would cost to fix those problems, and where there are significant upgrades needed. It is not able to provide assurance of equity in infrastructure provision.

The lack of systemic planning has impacts on equity due to gaps in infrastructure provision being filled by P&C fundraising and voluntary contributions made by parents, especially because this means that schools with more wealthy parents can fund better infrastructure for their own children.³ During the last inquiry, one school's P&C noted that its lower socioeconomic status of its local community meant that the rate of voluntary contributions sat at under 10% a year. This led to a situation in which, as the P&C describes:

We literally ran sausage sizzles and cake stalls to pay for landscape features which should be fundamental to school environments. If our children had decent places to sit down to eat their lunch, and classroom essentials for maths, science, drama and physical education, then our fundraising could be spent on enhancements above and beyond the basics instead.⁴

There is some potential for voluntary contribution schemes to lessen the burden of infrastructure cost overall, so that the Government can put more resourcing into schools with less parent capacity to contribute, but this would require the Education Directorate to establish minimum property quality standards for every category of asset, so that it can determine precisely where resourcing should be directed. For this we need comprehensive system planning and provision, rather than ad hoc and piecemeal gap-filling.

In 2019, the Audit Office found that the Education Directorate had property quality standards for school canteens, toilets, and carparks. By way of an example, they showed that canteen quality standards looked like this:

³ The *School Management Manual* specifies that a building fund with DGR status can be set up and used on the "acquisition, construction or maintenance of the existing buildings ... or any school building to be erected, that are used or to be used, for a purpose connected with the school curriculum." It says that this excludes "maintenance costs related to the non-school use of a building ... costs of maintaining facilities which are not buildings ... or running expenses such as water, gas, electricity, sewerage, contents insurance, or the general upkeep of furnishings." ('Building Fund Rules', *School Management Manual* Part 6.13)

⁴ [Submission number 6](#), Inquiry into the management of ACT school infrastructure.

Table 2-2 Example property quality standards for school canteens

Canteen
Is the layout adequate to support sequential preparation and assembly of food items?
Does the work environment have slip resistant floors?
Is there good lighting to carry out tasks safely?
Is there adequate ventilation?
Is there air conditioning to the canteen?
Is the level of noise generated by items such as the exhaust hood acceptable?
Is there adequate hand washing facilities?
Is the canteen located centrally in the school?
Is the canteen facing a central outdoor space?
Is there good line of sight to external service counter?
Are the work surfaces resilient and hygienic?
Are the cupboards in good working order?
Is service counter able to cater to the needs of students of all year levels?
Does the layout of the servery area avoid student crowding so as to discourage bullying and other antisocial behaviour?
Is the service counter accessible to any user?

Source: ACT Audit Office, based on Education Directorate information.

Property quality standards had not been established for school infrastructure assets other than canteens, toilets and carparks as of 2019. Consequent to this finding, the report recommended that the Education Directorate should:

Complete the development of property quality standards, and incorporate them into the asset management system. Property quality standards should then be used to assess the performance of assets and identify if the assets are being appropriately used, maintained and are fit for purpose.

The Government agreed to this recommendation in its response made in April 2020. We recommend the current inquiry investigate the progress made against this goal.

The difference between the recommendation made by the Audit Office in 2019 and our recommendation here is that the Audit Office recommended changes that would better enable schools to manage building services. Our recommendation goes further, proposing standards that are established and assessed centrally, with upgrades funded centrally, to ensure equity and a streamlined, cost effective and systematic approach. This better aligns with the centralisation of building services, which is covered in the next section of this submission.

Recommendation 2 - Equity across the public school system:

Establish comprehensive minimum standards for all school sites, audit all school infrastructure against these standards, and set out a schedule for improvement until all sites reach minimum standards. Report on progress against these standards in annual reports.

Increase ACT budget allocation for Education in line with necessary improvements identified through this process. The audit work and identified necessary upgrades should not be the responsibility of school principals, but of a dedicated team in the Education Directorate.

The need for effective planning and maintenance systems

The 2019 Auditor-General report and 2022 Legislative Assembly inquiry report highlighted the need to fully implement strategic asset management for planning, upgrades, new builds, repairs and maintenance. While these reports may have prompted action to begin to implement better management systems, the AEU can see that the impacts are not yet comprehensively felt in schools. The AEU office regularly receives calls from teachers who are concerned by the state of their schools, because of hazards such as mould or animal excrement, extreme temperatures, sub-standard staff accommodations, and so on.

The 2019 Auditor-General's report into the maintenance of school infrastructure diagnosed "poor supporting systems and processes" for the management of assets, annual maintenance plans that "varied in their purpose, quality and comprehensiveness", and insufficient building condition data that increased the risk of works undertaken being "costly, reactive and uncoordinated".⁵

A major focus of the Auditor-General's report was the lack of clear information regarding who held responsibility for each task in the maintenance and repair, as responsibilities are spread between Infrastructure and Capital Works (ICW) in the Education Directorate, and schools. The *School Management Manual* now specifies what ICW is responsible for and what schools are responsible for. This is an improvement with regards to clarity, but it has not decreased the burden on schools (i.e. on school principals) to oversee complex maintenance schedules.

To show this operational burden in its entirety, we attach a list of the tasks that are the responsibility of schools as prescribed by the *School Management Manual* at Attachment A. There are 136 items on this non-exhaustive list which are the domain of schools, rather than ICW. Many of these tasks are essential for the provision of minimum safety standards under Work Health and Safety legislation. Some require daily or weekly inspections, some are annual or biannual tasks. This complex rolling calendar of maintenance and repair must currently be managed by the school's business manager under the direction of the principal, with many of the tasks undertaken by the school building services officer (BSO).⁶

Our members do the best they can under these circumstances. They identify immediate issues at their own schools and seek solutions to them. They also, however, almost always diagnose systemic issues with the ways that school infrastructure is managed. The most typical comment received from members is that the Education Directorate should have a standard roster of checks, repairs and maintenance that are done preventatively and routinely, and managed and funded centrally. Put simply, school infrastructure should be treated as a *system*, not a collection of autonomous sites.

In an example of this, the Education Directorate has encouraged schools to request repairs or upgrades to infrastructure via the mechanism of an AEU sub-branch motion, whereby the AEU members of a school identify an issue and demand a fix through the union's formal democratic processes. While we are proud that such a mechanism is seen as an effective one, it should never be

⁵[Maintenance of ACT Government school infrastructure](#), 2019, ACT Auditor-General, pp. 1-2.

⁶ The rolling calendar of routine maintenance as well as the obligation to see to unplanned and urgent repairs adds up to a significant workload for BSOs. The AEU office has recently heard an example of the way this can negatively impact the provision of education in a school: a school assistant, whose job it is to support learning, asked to conduct electrical testing and tagging for the school site because of a BSO's limited capacity alongside their other tasks.

the default. Repairs and necessary upgrades should be routine, not a cause that teachers must fight for in their own time.

The current state of building asset management particularly and detrimentally impacts our principal members. Principals describe their anxiety at trying to manage their school budgets, wherein they must attend to infrastructure maintenance through local school budget, which means they must decide what pressing need gets fixed and what does not.

The 'school budget' operational component is called the School Operational Allocation or SOA. The Education Directorate states that the SOA:⁷

Provides cash funding for school operations – other than staffing. The funding is for educational and school administration costs, including energy, water and sewerage, cleaning and minor maintenance.^{8,9}

Module 7 of the *School Management Manual*, which instructs schools regarding how to manage infrastructure, gives the following policy intent regarding the split between school and system responsibility:

The intent of the new Schools Operational Allocation (SOA) implemented in 2017 as part of the Student Resource Allocation (SRA), is to allow greater school-based decision making in relation to school expenditure. This empowers schools and gives school leaders greater control over how their budget and resources are allocated based on what works best for their school, within system-wide parameters. It also ensures that decisions made are as sensitive as possible to local circumstances and identified school priorities.¹⁰

While the intent here is reasonable, the approach of devolving responsibility from system to school has negative outcomes. We have described the difficulties principals experience with school budgets in a recent discussion paper developed in consultation with AEU principal members.¹¹ In it, we discuss the ways in which school budgets are currently a source of frustration and anxiety for school leaders, who are trying to do the best for their schools, their staff, students, parents, and community, with limited resources and budget structures that are at once rigid and nebulous. The main issue is that our principals, some of the most experienced and skilled educators and leaders in the ACT, spend a significant amount of time every week trying to figure out how to solve budgeting and infrastructure problems. This is not leveraging their educational expertise and does not allow them the time to be instructional leaders.

⁷ Education Directorate factsheet titled '[Student resource allocation in ACT public schools](#)'.

⁸ Module 6 of the *School Management Manual* instructs schools to set individual expenditure budgets based on the overall SOA budget, and states that schools are expected to manage their total school's operational costs within their total allocated budget. See SMM Module 6 "Financial Management", part 6.5.15-16.

⁹ It should be highlighted that school level budgets need to pay for essential utilities. The presumed purpose of this is for schools to be encouraged to reduce their use of electricity, gas and water for cost and environmental reasons. The perverse outcome, however, is that principals spend time thinking about how to reduce spending in other areas of their budget in order to meet rising electricity prices, for example. This is clearly not a good use of school principal time and educational expertise.

¹⁰ *School Management Manual* module 7, page 5.

¹¹ '[Enough of the rhetoric and obfuscation': What must change to allow principals to be educational leaders](#)', Discussion paper of the Principals Workload and Budget Transparency Working Group, AEU ACT, December 2022.

All tasks listed in *Attachment A* must be funded by a school's annual School Operational Allocation or SOA. In 2019 the Audit Office found that schools "consistently reported expenditure on repairs and maintenance that was above [i.e. exceeded] funding through the School Operational Allocation."¹² Throughout the *School Management Manual* there are mentions of savings that can be made if schools implement 'prudent' resource management. The Manual says that:

Any savings generated from the SOA can be re-invested in the school to improve student outcomes (academic, wellbeing and cultural integrity) and to implement additional sustainability measures, which may provide further efficiencies in operational costs.

So, to put this plainly, if a school has less costs associated with infrastructure maintenance and repair, it has more to spend on the needs of their students. There are obvious consequences here for equity.

We also know from the Auditor-General's 2019 report that this reactive and inconsistent approach to maintenance and repair is not cost effective. The report observes that "the majority of repairs and maintenance managed by schools is reactive maintenance, rather than the preferred and more cost-effective planned maintenance."¹³ The cost of this approach in 2018-29, the report finds, was \$2.25 million against a budget of \$1.33 million, in addition to a twelve percent management fee charged by the ACT Property Group, who undertook this work through a Service Level Agreement with the Education Directorate.

In summary, we identify the following issues with the current arrangement:

- A complex and rolling program of work that must be managed by a limited number of staff (often just the business manager and a BSO) with limited assistance from ICW
- Complex shared responsibilities between schools and ICW
- Repairs and maintenance program developed by people with limited asset management or technical trade skills, because they are educators and administrators
- Schools encouraged to spend less on infrastructure in order to spend more on other student needs
- Principals, who should be enabled to educational leaders and have time to mentor teachers and meet with students and parents, needing to spend a lot of time on site and budget management

Solving these issues must involve a reset of the assumptions around school versus system responsibility. The Education Directorate is responsible for the upkeep of its own assets. The Director-General is the PCBU for WHS purposes (as discussed later in this submission). There is no reason for the responsibility to maintain basic infrastructure standards to be devolved to principals and school budgets, except for the Directorate to avoid direct accountability for keeping its own assets in good working order.

¹² ['Maintenance of ACT Government school infrastructure'](#), 2019, ACT Auditor-General, p. 2.

¹³ ['Maintenance of ACT Government school infrastructure'](#), 2019, ACT Auditor-General, p. 47.

Centralise building services

We propose that many building services become centralised, to increase the knowledge and efficiency of the Education Directorate's building services while ensuring that teachers can teach, and leaders can lead. We suggest that such a centralisation involve the following:

- BSOs to remain embedded within schools
- The Directorate conduct a comprehensive review of all school level asset management responsibilities in consultation with school leaders, which identifies school level responsibilities that do not require educational expertise
- These responsibilities moved to the responsibility of the Directorate, along with their cost (i.e. take these out of the SOA)
- Make central funds available for necessary repair and maintenance that remains the responsibility of schools (i.e. take these out of the SOA)
- The central building services unit should:
 - o Audit every school site against comprehensive minimum standards making full use of the Directorate's asset management software
 - o Arrange routine and urgent repairs and maintenance, liaising with schools only for the purposes of arranging best times to visit and ensuring access to sites
 - o Manage all budgetary implications for works (i.e. not invoice schools; principals should not need to know the costs of essential work, let alone be responsible for paying for it)
 - o Have a hotline available for principals, BSOs and business managers
 - o Visit every school site at least once a term to conduct regular inspections, including assessments against the recommendations in the *Work Health and Safety (Managing the Work Environment and Facilities Code of Practice) Approval 2020*
 - o Have network-specific teams who understand the schools in a particular area in greater detail, and who are personally deployed to a school of their network when there is a problem
 - o Directly employ tradespeople in secure jobs to perform most works
 - o Have deadlines for response from unit to schools, including, for example,
 - 24-hour turnaround for urgent repairs necessary for safety
 - One week deadline for all other repairs to be booked in as soon as possible, including an initial written response to request within 48 hours

Ensure system resourcing for system reform

There should be infrastructure cost considerations by default for all system-wide initiatives and reforms. If the Education Directorate or ACT Government has undertaken a change that affects schools, it should assess any need for infrastructure spending as a result, and then provide additional funding within the package of the reform.

An example of this is the Period Products and Facilities (Access) Bill 2022, which was introduced to the Legislative Assembly last year. The AEU supports the Bill and we look forward to it being passed this year. We note, however, that the way it proposes to legislate access arrangements for free period products will necessitate infrastructure works for some schools. Clause 13 of the Bill reads:

13 Access arrangements—government schools

(1) The director-general responsible for administering the Education Act 2004 must make arrangements, in writing, for access by students of government schools to period products on government school premises.

(2) An access arrangement for government school premises must provide for—

(a) how a student accesses a period product on the premises in a way that respects the dignity of the student accessing the product

...

Examples—respects the dignity of the student

1 providing a reasonable amount of privacy for a student seeking access

2 protecting the personal information of a student seeking access

The Bill's requirement that a student be able to access period products in a way that respects their dignity, including the privacy of the student, will likely necessitate minor infrastructure upgrades in some schools. This might mean installing an extra door or screening so that a student can discreetly access the period products, or it might entail building new all-gender accessible toilets at some sites.

With the current infrastructure management processes in place, it is unclear how schools will fund upgrades that are necessary in order to comply with this legislation. The worst case scenario, which worries principals due to it having happened before, is that funding is delayed or not awarded, and consequently schools must find the money in their SOA. The period products legislation is just one example of a positive initiative that requires an infrastructure investment. When these are introduced, the default arrangement should be that the Education Directorate guarantee funds necessary to upgrade school infrastructure to support such a project.

Review major upgrades funding process

Responsibility for capital works and upgrades is shared between schools and ICW. The *School Management Manual* specifies a layered approach where projects that meet certain criteria for cost and risk are managed by ICW and others managed by schools.

If the Education Directorate established comprehensive minimum standards, fully utilised its asset management software, and the ACT Government committed to fully upgrading every school site to ensure equity, then it would be a simpler task for schools to see when and how they can fund essential upgrades as their communities grow and student needs become more complex.

Recommendation 3 – Improve planning and maintenance systems:

Reform budget processes within the Education Directorate so that all repairs, maintenance, upgrades and new builds are funded centrally and undertaken by a centralised building services unit. Provide transparency of decision-making regarding how works are prioritised.

Centralise building services to allow school principals to be educational leaders rather than asset and budget managers. Ensure system-wide reforms have system-wide resourcing for infrastructure implications. Review processes for major works to ensure equity and lower school leader workload.

Inclusion of all students

The Education Directorate is committed to making progress on inclusion of all students in all schools, which means making all schools accessible for students with disability. For the Inclusion Strategy (due to be released in 2023) to be fully implemented, there must be an enormous investment in infrastructure to all ACT public schools over the next decade.

The Education Directorate's draft position statement on Strengthening Inclusive Education¹⁴ states that,

An inclusive education system will be achieved by supporting schools to be communities where:

- human diversity is valued as the status quo and making adjustments to cater for diverse learning and wellbeing needs is standard practice;
- allocation of resources is considerate of relative student need and time required for planning, training, and participation in collaborative practices;
- schools are designed for a diverse range of learners using universal design principles, allowing flexibility over time, responsive to the particular students attending, their respective needs and the safety and wellbeing of all;

It goes on to describe the physical requirements of this vision by stating that,

Our learning environments need to be welcoming and accessible to diverse user groups, including students with sensory processing needs and intellectual disability and should develop the whole student – intellectually, emotionally, socially, physically, and culturally.

The ACT Government needs to commit to funding the essential infrastructure upgrades that will be the foundation of inclusion reforms in our schools. We estimate that the overall cost of a meaningful inclusion reform package is likely to be in the tens of millions. To look to the case of one of our neighbours, for example: Victoria announced in 2020 a \$1.6 billion investment to transform their public education system to be more inclusive, including costs to upgrade infrastructure, enhance school planning and teaching, and employ more specialist staff.¹⁵ Adjusted for population (the ACT has around 7% of the student population of Victoria), the same investment would cost approximately \$113 million here.¹⁶

The Inclusive Education Strategy currently being developed by the Strategic Policy area of the Education Directorate takes infrastructure into account, alongside other cost-heavy themes including expanding and developing the teaching and support workforce, and increasing provision of non-infrastructure resources. It is likely that infrastructure will be a central part of the cost of the strategy, which will be implemented over a decade.

While it is appropriate for the Inclusive Education Strategy to define the approach taken to transform our capacity to deliver education to all students, there are things we can identify and do

¹⁴ Education Directorate, 'Strengthening Inclusive Education in ACT Public Schools: Discussion Paper', November 2022.

¹⁵ Premier of Victoria Media Release, '[Inclusive Education: Making sure our kids can be their best](#)', November 2020.

¹⁶ However, note that this was for a 100 school pilot program, so may actually be fairly representative of our needs in the ACT.

now to increase capacity for inclusion. These include the provision, at every school, of quiet rooms or withdrawal spaces including sensory spaces and gardens, ramps and handrails, and toilet and shower modifications. This work should first accommodate needs of existing students, and then work with research produced by Strategic Policy with regard to projections of disability and diagnoses over the next few decades. This research shows that atypical sensory processing diagnoses are expected to increase, for example, which necessitates particular infrastructure provisions such as quiet withdrawal rooms and sensory gardens.

The Education Directorate does not need to reinvent the wheel when it comes to establishing a list of minimum standards with regards to inclusion of students with disability. Other jurisdictions have done so – for example, the South Australian Government’s report titled “Effective Building Practices for Children and Students with Disability”¹⁷ offers a comprehensive view of what universal design for inclusion in schools looks like. Such a report can be adapted and updated to mirror what we know about the ACT school community now and projections into the future.¹⁸

A transformation of ACT public school infrastructure for the purpose of inclusion can only be accurately costed if the Education Directorate understands the current state of, and issues with, its physical assets, and if a comprehensive set of minimum standards is created so that it can identify gaps between the two.

While the Education Directorate states that the needs of existing students will be immediately seen to, the practical implementation of this is patchy. The reasons for this have been outlined earlier in this submission: budget structures that make principals find money in school level budgets for changes. We also know that there are delays between the annual Student Centred Appraisal of Need (SCAN) process being conducted and schools receiving funding to source extra supports.

If the Education Directorate genuinely intends to make all schools inclusive for all students, then budgetary frameworks need to be reset to reflect this system responsibility. Funding for essential modifications needs to be quickly and centrally funded. When a student, parent or school identifies a barrier to full access for every student, the Education Directorate needs to act to overcome that barrier. It should never be the responsibility of the school’s principal to review their budgets to figure out what other student needs can be overlooked so that essential upgrades can be funded.

Recommendation 4 – Commit to inclusion of all students:

Commit to fully funding infrastructure upgrades deemed necessary by the 2023 Inclusive Education Strategy, through a discrete and centrally funded program. Consider a whole-of-government approach to this. Adapt universal design standards from other jurisdictions to complement ACT schools minimum standards. Use this to set a schedule of upgrades so that every school site has capacity for inclusion. Reset budgetary approaches to ensure that schools are fully funded to perform all necessary upgrades.

¹⁷ [‘Effective Building Practices for Children and Students with Disability project report’](#), Department for Education and Child Development, Office for Strategy and Performance, South Australian Government, August 2016.

¹⁸ To ensure that universal design for inclusion is truly universal, these minimum standards should form part of the minimum property quality standards discussed in the previous section of this submission. In this way, inclusion would be planned for as default, not an option.

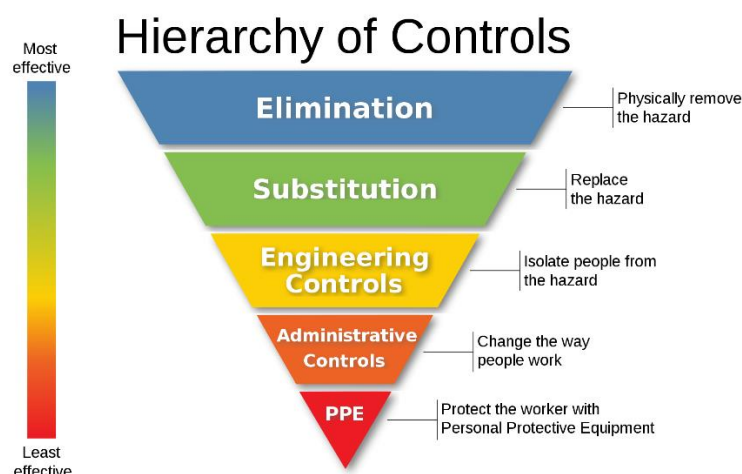
Safety for teachers, principals, school assistants, and students

Under the *Work Health and Safety Act 2011* (ACT; hereafter 'WHS Act') s 18, the Director-General of the Education Directorate (as the 'person conducting a business or undertaking', or PCBU) has a positive duty to ensure that all people are afforded the highest level of health and safety protection from hazards arising from work, so far as reasonably practicable. The term 'reasonably practicable' means eliminating or minimising a hazard or risk given the likelihood of it occurring, the degree of harm that might result, what the PCBU knows about the risk or hazard, and the availability and cost of eliminating or minimising the hazard or risk.

The Education Directorate has extensive knowledge of risks and hazards in its built environments. The data it holds includes Riskman reports about dangerous occurrences, workers compensation claims, and information about injuries (including injury type and duration of lost work time as a result of injury) sorted by school, school type and employee classification. The Directorate knows that poor working conditions coupled with violent or unsafe incidents causes severe injury to its employees, both physical and psychological. The ACT Government has the money to be able to make its schools safe, especially balanced against the risk of serious harm and the frequency with which workers in schools are injured at work. The AEU argues that it is entirely reasonably practicable to improve infrastructure to make ACT public schools safe for work.

Our recommendations regarding safety are guided by the *Work Health and Safety (Managing the Work Environment and Facilities Code of Practice) Approval 2020* (ACT; hereafter 'the code of practice'). This was made under section 274 of the WHS Act. Codes of practice can be used in court as evidence of what is known about a hazard, risk or control, and may be used to determine what is reasonably practicable for the PCBU to provide to its workers.¹⁹ For example, a WorkSafe ACT inspector might refer to a code of practice when issuing an improvement or prohibition notice to a PCBU.

We suggest that a WHS approach as identified in the *Work Health and Safety Regulations 2011* be taken to assess both physical and psychological risks and hazards in our schools, and to undertake systemic reduction of risk. Of course, schools are places of learning for students as well as places of work for staff, but WHS principles are useful to assess safety for all people in a school because they are comprehensive and enforceable.



¹⁹ [Guide to Codes of Practice](#), Worksafe ACT.

A WHS approach to assessing the safety of the built environment of schools asks us to use a systematic and hierarchical control-based process. The code of practice describes the following activities:²⁰

- Identify hazards: find out what could cause harm.
- Assess risks, if necessary: understand the nature of the harm that could be caused by the hazard, how serious the harm could be and the likelihood of it happening. This step may not be necessary if you are dealing with a known risk with known controls.
- Control risks: implement the most effective control measures that are reasonably practicable in the circumstances in accordance with the hierarchy of control measures, and ensure they remain effective over time.
- Review control measures to ensure they are working as planned.

The Education Directorate's Occupational Violence Management Plan describes this in detail.²¹ It says,

The principle behind the hierarchy of control is that risk controls that are dependent on individual behaviour are less reliable than risk controls that engineer or design out risks. In most cases a combination of measures will be required as risks are usually related to several factors or a sequence of events.²²

We can thus look to the *Work Health and Safety (Managing the Work Environment and Facilities Code of Practice) Approval 2020* as a guide for the layers of control that should be in every school site to eliminate or reduce risk. The code of practice has recommendations regarding the following, all of which are relevant for schools:

- Entries and exits
- Workstations
- Floors and lighting
- Housekeeping
- Ventilation
- Thermal comfort
- Access to break facilities (e.g. staffrooms)
- Toilets
- Hand washing
- Personal storage
- Emergency plans

Additionally, work safety regulators have identified the ways in which the physical environment of a workplace can contribute to psychosocial harm. Safework Australia specifies that this can look like, for example:²³

²⁰ [Work Health and Safety \(Managing the Work Environment and Facilities Code of Practice\) Approval 2020.](#)

²¹ '[Occupational Violence Management Plan](#)', Education Directorate, July 2017.

²² '[Occupational Violence Management Plan](#)', Education Directorate, July 2017, p. 7.

²³ '[Poor physical environment](#)', Safe Work Australia.

- Conditions that affect concentration (e.g. high noise levels, uncomfortable temperatures or poor lighting), or
- Unpleasant conditions such as poorly maintained amenities, unpleasant smells or loud music

When these are severe, prolonged, or frequent, they become a hazard that can cause psychological injury.

For the rest of this section, we highlight some urgent issues that affect many of our school sites which would emerge through regular, systematic and comprehensive assessment of all school sites against the code of practice.

Immediately and centrally fund infrastructure works to reduce violence risk

Some of the most distressing occupational violence incidents reported to the AEU office have taken place in situations where a teacher, principal or school assistant is cornered in a space by a student and assaulted. The physical impact of such assaults is sometimes severe, but the psychological impact of such incidents is often what keeps our educators out of the classroom for a long time thereafter. We see too many educators diagnosed with PTSD that is directly associated with not being able to keep oneself safe in school buildings when dealing with students who display challenging behaviours. We should not accept that physical injuries and PTSD diagnoses are possible outcomes from a normal day of work for any ACTPS employee.

Occupational violence risk assessments (OVRAs) are completed following serious incidents of violence - typically physical violence of a student against a staff member. OVRAs often include recommendations for infrastructure upgrades to ensure that a student's presence in a room is safer. These might include, for example: installing walls or doors, creating new exits, ensuring line of sight into a room, removing access to makeshift weapons (like instant boiling water taps or kitchen knives), installing transparent panels over reception counters to prevent climbing, and fitting access buttons and/or duress buttons.

The issue with this arrangement is that such upgrades then become budgeting issues described earlier in this submission. The most common issue principals report is that there is such a delay between an OVRA identifying a control and the related funds being put into a school budget that principals must choose between delaying implementing the control, using money budgeted for something else in the SOA, or risk incurring a budget deficit.

Every space in a school should have multiple exits for use in an emergency. Where there are occupational violence incidents that involve a person being cornered and unable to escape assault, this should trigger an immediate review of the space jointly conducted by ICW and the unit responsible for safety in the Directorate²⁴ in consultation with the school, and any recommended infrastructure upgrades centrally funded, immediately.

Develop long term air quality plans

The Education Directorate developed a comprehensive emergency response toolkit for schools during the 2019/2020 bushfire season which saw Canberra suffer extremely poor air quality. This toolkit includes risk assessments for staff and students, a checklist to ensure schools were safe to open in 2020, and communications materials for parents and communities.²⁵

²⁴ This is currently the Safe at School Taskforce.

²⁵ ['Managing air quality in ACT public schools'](#), Education Directorate.

Shortly after this, the pandemic demanded another assessment of the safety of air for schools – but rather than ensuring that spaces could be effectively sealed shut, it required that open air ventilation was possible for every classroom. As a result, the Education Directorate further improved its knowledge of school buildings, and ensured that, for example, almost every window in a school campus can open to let in fresh air.

Given the continued risk to air quality and viruses from future bushfire and pandemic events, this work must continue. While natural ventilation is best, Safework Australia recommends secondary provision of mechanical ventilation to enhance air quality, including the use of HVAC systems, improving central air filtration, use of exhaust fans, and air purifiers with HEPA filters.²⁶

Improve essential facilities like toilets

The previous inquiry into school infrastructure highlighted many student toilet blocks that are not fit for purpose. Odour was an issue noted repeatedly, with comments from various schools saying that odour embedded within concrete or grout had rendered them almost unusable. There are obvious concerns here for student health and human rights. The toilet blocks of new builds have updated materials that do not trap odours as much as concrete or grout. If toilets have odours that cannot be removed through cleaning, then they should be immediately replaced.

Ensure safe temperatures in classrooms

Thermal comfort is listed by the *Work Health and Safety (Managing the Work Environment and Facilities Code of Practice) Approval 2020* as a factor in determining whether a workplace is safe. It recommends a range between 20 and 26 degrees Celsius for sites where work is performed sitting down.²⁷

Currently, the AEU and Education Directorate have an agreed policy that educators can decline to work in an environment that is cooler than 17 degrees or warmer than 30 degrees. The AEU office regularly receives calls from members during winter and summer to say that their classrooms are reaching unacceptable temperatures, and we advise them of this policy.

The policy was created before the pandemic, and the need for natural ventilation while we continue to protect against the spread of Covid-19 means that the ability of educators to regulate the temperature of their classrooms is diminished, because they must keep windows open. Climate change means that extreme temperatures are likely to become more frequent. These factors combined mean that the future of ACT public school infrastructure must involve planning for improved temperature control capabilities built into school infrastructure.

To further this work, we recommend that the Education Directorate:

- Monitor school environments to ensure a temperature range of between 18 and 28 degrees Celsius, and
- Initiate a rapid response when classroom temperatures fall outside these limits, involving investigation and remedial steps taken to restore temperatures to within identified limits.

In the longer term, the maintenance of thermal comfort must form part of considerations made for ventilation plans, whether such plans use natural or mechanical ventilation.

²⁶ [‘Improving ventilation in indoor workplaces: COVID-19’](#), Safe Work Australia, November 2021.

²⁷ [Work Health and Safety \(Managing the Work Environment and Facilities Code of Practice\) Approval 2020](#).

Provide adequate staff accommodations

The *Work Health and Safety (Managing the Work Environment and Facilities Code of Practice) Approval 2020* discusses the provision of adequate staff break facilities, such as staffrooms in schools. Drawing on this, the AEU has requested that the Education Directorate provide staffrooms that meet the following minimum standards:

- i. A workspace that is separate from classrooms;
- ii. Staffrooms not to be open to general student access;
- iii. Meeting space that is sufficient for staff collaboration;
- iv. Access (within reasonable travel distance) to a kitchenette including fridge, sink, microwave and food preparation space;
- v. Access to stationery such as markers, notepaper and pens;
- vi. Personal lockers or other secure storage for valuable items;
- vii. Accommodation that is a reasonable distance to classrooms, noting requirements of role.

We also note that school assistants (including learning support assistants, or LSAs), are sometimes not included in planning for staff facilities. The number of school assistants is increasing rapidly, and they are asked to provide increasingly complex modes of support to teachers and students. Often, school assistants will need to do work involved in helping to prepare a lesson or modify an activity for a student, or time to help collaborate with a teacher to prepare for lesson delivery. Without dedicated staff spaces for school assistants, this work is done in classrooms at student desks or even in storage rooms or cupboards, according to reports received by the AEU office. School assistants are highly valued by schools, and this must be reflected in the provision of adequate staff facilities for them.

Recommendation 5 – Ensure safety for teachers, principals, school assistants and students:

Immediately and centrally fund infrastructure works to reduce violence risk both preventatively and when an OVRA identifies an environmental control to reduce risk.

Develop long term air quality plans. Improve essential facilities like toilets. Ensure safe temperatures in classrooms. Provide adequate staff accommodations.

Design specifications

The Education Directorate's Infrastructure Specifications (EDIS) sets out the design of new school builds and major refurbishments. The AEU has been shown the current EDIS brief by Education Directorate officials and we commend the current version. Crucially, it has been developed collaboratively between architects and designers, and teachers and school leaders. The current EDIS brief was used in the refurbishment of Belconnen High School, which has been significantly upgraded to have comfortable and modern learning spaces, characterised by the use of glass as shown in the photos below.

We suggest that the success of the EDIS brief as used in the Belconnen High refurbishment is a result of an approach that prioritises teaching innovation, behaviour management, flexibility, and knowledge of the school's needs and people.



Figure 1: Classrooms at Belconnen High, separated by a glass divider. [Bickerton Masters](#).

Teaching innovation

The EDIS brief uses glass between classrooms and builds in multiple lines of sight between rooms so that teaching is visible to others outside the classroom. During a hearing from the last inquiry, Kate McMahon of the Education Directorate spoke to the advantages of this, saying,

When we de-privatise teaching by being able to see each other, we draw on each other's strengths, and we build and support the development of teachers in a really authentic way which leads to better engagement and better learning outcomes for our students.²⁸

Note that in the photo above, the teachers in each of the two classrooms can see each other, but the students are faced away from each other, facing each whiteboard. This means that teachers have company, even just visually, while students remain focused on the teacher in front of them.

This is especially useful for beginning teachers, who can seek feedback from colleagues on their practice, or get help quickly from a colleague should an emergency occur.

²⁸ ['Transcript of evidence, 7 March 2022'](#), ACT Legislative Assembly Standing Committee on Education and Community Inclusion, p. 125.



Figure 2: Classrooms in Belconnen High, with glass walls enabling line-of-sight between flexible learning area and classrooms. [Bickerton Masters](#).

Behaviour management

The high visibility between people in this design means that students are made more aware of how their behaviour might affect others, because they are seen by others more. We have received anecdotal reports that this has a positive impact on challenging behaviours and helps to prompt students to self-regulate.

Flexibility

Significant refurbishments and new builds need to be investments that can alter according to changes in pedagogical best practice as this inevitably evolves over the coming years. Being able to flexibly use spaces is key. We recommend walls between classrooms that can be opened or closed to accommodate different activities and group sizes, and that can be replaced if, for example, a school decides that glass is no longer the material they want as classroom walls.

Understanding needs of school

It is not a coincidence that the current EDIS brief has been successfully developed and implemented at Belconnen High by the former principal of the same school. This means that consultation with the school community relied on a strong foundation of relationships and that there was existing knowledge of the school's needs built into the design.

Further use of the EDIS brief needs to ensure that the design for school builds or refurbishments is adapted via thorough consultation with the school community and staff. This includes all staff – teachers and school leaders, as well as school psychologists and school assistants.

Quality of new builds

The ACT's newest school, Throsby, has been praised by our members for the quality of its build. The school feels modern and spacious, with natural light and clean lines. AEU members have remarked that the physical environment of Throsby School "makes you feel like the Government values the local community." We encourage future new builds and major refurbishments to achieve a similar feeling of calmness, quality, and professionalism. When such qualities are built into schools, students and staff feel better supported to reach the high expectations of them set out in the *Future of Education*.



Figure 3: Entrance to Throsby School. [Gray Puksand](#).

Capacity issues

We recommend that the Committee re-examines the formula used to calculate school capacity to assess its efficacy in avoiding overcrowding. The Education Directorate specified in 2022 that capacity is calculated by identifying each classroom space in a school and assigning a multiplier of 25 students.²⁹ For the purposes of this calculation, 'classroom space' excludes halls, libraries, and other non-teaching spaces like staffrooms.

When a school's enrolment reaches 85% of this capacity threshold, the Directorate takes action. This may include adding demountable classrooms for temporary expansion, or upgrading or changing the

²⁹ [Transcript of evidence, 7 March 2022](#), ACT Legislative Assembly Standing Committee on Education and Community Inclusion, p. 116.

use of existing spaces. It also means that the school will be made a 'Category A' school, meaning it will not take out-of-area enrolments in typical circumstances, if this is not already the case.

This strategy should work, but qualitative evidence provided to the AEU by our members and from P&C communities to this committee suggests it does not. We propose that this may be because the formula used to calculate capacity is not sophisticated enough to capture the way schools operate.

For example, if we take a small and non-exhaustive sample of schools that indicate overcrowding problems,³⁰ we can see that all remain 'under capacity' according to the Directorate's calculations:

School	Capacity as at Feb 2022 ³¹	Enrolments as at Aug 2022 ³²	'Capacity' reached
Arawang PS	562	558	99.2%
Garran PS	783	592.2	75.6%
Gungahlin College	1280	1111.2	86.8%
Harrison P-10	2187	1593	72.8%
Latham PS	438	344	78.5%
Maribyrnong PS	689	468	67.9%
Majura PS	906	702	77.4%
Mawson PS	533	469	88.9%
Mount Rogers PS	633	516	81.5%
North Ainslie PS	735	593.4	80.7%
UCHS Kaleen	657	504.6	76.8%

Despite all of these schools being technically 'under capacity', all report crowding issues, and some report pressures to convert parts of multipurpose/hall areas or libraries into regular classroom teaching spaces, despite these rooms not being included in the calculation for space capacity. This indicates that the capacity calculation is not able to tell us that a school is overcrowded.

For Arawang School, which currently sits at 99.2% capacity as per the table above, this has led to urgent reconfigurations of the school's learning spaces. In 2020-2021, because of increases in school enrolments that outsized physical capacity, the school had to take the following actions:

- Use two existing teacher office spaces as classrooms
- Use a corridor as a classroom, creating a wall with noticeboard partitions (see image below)
- Subsequently move classroom in corridor into space designated for library

These emergency actions meant that there were very few quiet spaces for teachers to work independently or collaborate, and a library operating at significantly diminished potential because of the relocated classroom. Such arrangements are disruptive for students and stressful for staff. With adequate demographic modelling and sophisticated capacity calculations, they should be avoided.

³⁰ The schools listed here are those which brought up overcrowding in their P&C submission to the previous Inquiry, significant concerns represented from the school's Sub-branch to the Directorate on behalf of the AEU, and/or have had media coverage of their overcrowding issues.

³¹ '[Census of ACT schools](#)', Education Directorate, February 2022.

³² '[Census of ACT public schools](#)', Education Directorate, August 2022.



Figure 4: Corridor space used as temporary classroom during acute capacity challenges.

We recommend that the Education Directorate develop a new capacity calculation formula that can more adequately capture the lived experience of using school sites. This formula could begin with the basic 'classroom space x 25 students = capacity', and then add nuances to account for:

- Current and projected enrolment at each level of schooling, vis-à-vis class size limits (which vary depending on age grouping)
- Current and projected enrolment of students with disability, including current and projected specific needs (like sensory spaces, refurbishments to control lighting or sound, doors and corridor refurbishments for wheelchair users, accessible toilet upgrades, and extra small group learning spaces that may alter class size calculations)

- Usage (including desired usage)³³ in colleges of specialist facilities for BSSS subjects like design and technology, textiles, food studies, hospitality, metal and timber products, agriculture, chemistry, horticulture, digital technologies, dance, drama, live production, media, music, photography, and visual arts
- Usage (including desired usage) in primary and high schools of specialist facilities for learning areas like science, arts, technologies, and languages
- Usage (including desired usage) of non-classroom and non-teaching spaces like storage space, maintenance workshop, shaded playgrounds, play equipment, offices for all staff, community sporting and cultural activities/events spaces, OHSC facilities, canteen, and uniform shop
- Physical area footprint of each classroom, which should not include corridors

The Victorian School Building Authority uses a method similar to that described above which may be adjusted for ACT use.³⁴

Recommendation 6 – Resolve capacity issues:

Develop a school capacity calculation formula that more accurately represents usage of schools. Respond to existing crowding issues accordingly.

Digital infrastructure

The Education Directorate’s 2022-25 Strategic Plan states that it aims for “all parts of the education system to be aligned, efficient and effective”. Its intended outcome states that this looks like:

Student learning is enhanced through digital and data systems that support learning anywhere, with data available to enable tailoring of education offerings to match learning needs. ICT systems are contemporary and suitable to a modern education system.

This is a good aim, but there is a lot of work to do to get there. We make the following recommendations to upgrade ICT provision for ACT public schools, noting that this will require additional resourcing. Overall, we want to see a digital infrastructure landscape that makes work easier, not harder, and that enhances flexible and innovative teaching rather than needlessly collecting data that does not enhance student experience.

This starts with procurement processes that involve establishing and monitoring end-user operational requirements, measuring outcomes or deliverables against these requirements, and adjusting future procurement as necessary.

Information management systems that enhance learning and do not increase workload

- Undertake a review of Sentral and increase capacity of the Sentral support team until issues are resolved
- Ensure that information management systems have mutual intelligibility to increase user ease, including major reforms or changes to software and systems used, aim to curb ‘churn’ of platforms

³³ This sometimes means that students are not able to do subjects of their choosing. For example, the previous inquiry [received a submission from a P&C](#) which showed that the dilapidation of cooking facilities leads to students not wanting to take the subject.

³⁴ [‘Capacity and area allocation’](#), Department of Education, Victorian Government, June 2020.

Hardware provision that meets basic teaching and learning needs

- Ensure that all staff have access to devices that suit their needs (e.g. laptops for all teachers, including casual relief teachers; tablet devices for all LSAs) with adequate battery life
- Make 'hot swaps' available at every school site so that staff can access a device if their needs temporary repair or maintenance
- Provide all teaching spaces with display devices (including screens and speakers), that can link wirelessly to all staff and student devices

Adequate technical support

- Engage IT officers at every school and ensure they have administrator access, training, and dedicated time to do their job
- Commit to quick responses to system issues by DSST/Shared Services, and increase staffing in the ICT support team in the Education Support Office to meet demand

Consultation and training

- Perform adequate consultation before changes are made to information management systems as per Section G of the *ACT Public Sector Education Directorate (Teaching Staff) Enterprise Agreement (2018-2022)*.
- Involve teachers in procurement and designing training, so that ICT provision meets educational needs
- Give all staff (including casual relief and school assistants) paid time to be trained to use any new or changed systems or hardware

Recommendation 7 – Improve digital infrastructure:

Review ICT procurement practices to ensure that these establish and monitor end-user operational requirements and evaluate ICT provision against these requirements.

Conduct a performance audit of systems supporting schools.

Ensure information management systems enhance learning and do not increase workload. Provide hardware that meets basic teaching and learning needs. Provide adequate technical support. Provide adequate consultation for changes and training when changes are made.

Measuring success

A crucial and currently missing feature of the management of infrastructure of ACT public schools is that the Education Directorate must measure its success meaningfully and transparently.

The 2022-25 Education Directorate Strategic Plan lists the following ways of measuring success of 'systems and supports', of which planning and infrastructure is a part: the school satisfaction and climate survey, school leadership survey, education support office staff survey, system evaluations, and 'most significant change' stories.

While qualitative, lived experience is important, asset management can be more comprehensively and meaningfully evaluated using the many data types held by the Education Directorate. We must focus not just on the perception of infrastructure quality, but also examine quantitative reporting that shows performance in concrete ways that can be tracked over time.

To do this, the Education Directorate must establish clear objectives, and report on its progress against these objectives. As discussed at length in the 2019 Auditor-General’s report, these objectives for asset management must be linked with the strategic aims of the Education Directorate as an organisation. We suggest this means that infrastructure management objectives must prioritise equity and excellence. In practice, for example, strategic priorities of equity and excellence could be measured by looking at consistency of asset quality between schools via audits against property quality standards, and a targeted decrease in spending on reactive repair versus proactive maintenance.

This level of detail in terms of objectives and outcomes is currently missing in public reporting. For example, the Education Directorate’s annual report of 2021-22 shows the following under ‘asset management’:³⁵

- The scope of the asset portfolio
- That there is a Strategic Asset Management Plan (but omits detail on this plan’s contents)
- General list of centrally funded repairs and maintenance works
- Ongoing work to manage hazardous materials (asbestos and lead paint)
- Space afforded for the 84 staff occupying office-based workstations (<1% of the staff population of the Education Directorate)
- Office accommodation works undertaken during the reporting period for these 84 staff

We recommend that the reporting regarding infrastructure include the following, to give a more accurate picture of what the Education Directorate does every year to uphold and improve asset management:

- Progress against minimum property quality standards, such as the number of schools that meet all standards in an asset category
- Progress against upgrades to ensure every school is inclusive for students with disability
- Expenditure on reactive repair versus proactive maintenance, with a target set to decrease the former as the quality of asset management processes improves
- Actions taken to alleviate overcrowding, and school capacity calculations for every site
- Office/staffroom facilities afforded to all staff, not just the <1% in office-based work
- Infrastructure upgrades funded by P&C fundraising and voluntary parent contributions
- Safety issues identified by WorkSafe ACT and works to remedy issues
- Digital infrastructure provision and upgrades

Recommendation 8 – Measure success effectively:

Set clear objectives for infrastructure management that link to the strategic objectives of the Education Directorate. Report progress against these objectives comprehensively and transparently in each annual report.

³⁵ [Education Directorate Annual Report 2021-22](#), pp. 264-268.

Conclusion

This submission proposes a suite of reforms that aim to create a better future for ACT public school infrastructure. Our vision is that in an ACT public school, everyone should feel like they belong. The built environment should make everyone feel safe, welcome, and comfortable. For students and staff, a school's physical environment and other facilities should be of a standard that makes you feel proud and cared for. We should have the same high expectations for excellence for our facilities as we do for our educators and students.

This future cannot be enacted if we do not deal meaningfully with the financial and operational obstacles that are currently preventing the Education Directorate from maintaining, repairing, improving and upgrading its assets. We hope the committee will consider making recommendations regarding systemic improvements that will make meaningful change.

The most important question for this inquiry to consider is: what does a meaningful alignment between the ACT Education Directorate's asset management systems and organisational objectives look like, and then how can we get to that vision in a way that is equitable, cost effective, and brings out the best in people? The recommendations we make in this submission aim to elicit such an alignment. We look forward to following the Committee's investigations on this important issue.

Attachment A: Tasks that are currently the responsibility of a school

As discussed in this submission, there are many tasks that a school must take responsibility for that could become the responsibility of a centralised building services unit. All of the tasks listed below are the domain of a school – typically a business manager oversees the program under a principal's direction, and the works are undertaken by the school's building services officer or contracted externally.

This list includes tasks that say 'paying the costs associated for X' because paying the costs of something impacts a school budget, and has an associated workload for school staff, as they must process invoices, liaise with government and non-government service providers, seek quotes and/or negotiate with contractors, and keep school financial records up to date.

This list is taken from Module 7 of the *School Management Manual*, with some minimal edits for readability.

General grounds maintenance

1. Maintaining irrigation system (excluding backflow prevention devices)
2. Maintaining turf (including mowing, edging, fertilizing and watering)
3. Maintaining synthetic turf installations in accordance with manufacturer's specifications
4. Removing trip and slip hazards
5. Maintaining shrubs and gardens
6. Conducting plant pest, disease and weed control
7. Maintaining loose and rubberised soft fall
8. Maintaining vegetable patches and orchard trees
9. Maintaining animal enclosures (e.g. chickens)
10. Conducting miscellaneous works such as tanbark and granite supplies, leaf raking, sweeping of footpaths and ad hoc labour
11. Maintaining External furniture
12. Conducting car park sweeping and line-marking
13. Repairing security fences
14. Paying costs associated with sports fields (including line marking, seating and jump/sand pits)

Other general repairs and maintenance

15. Conducting scheduled maintenance works (including works listed in the School Building Condition Assessment report issued by ICW)
16. Conducting unscheduled repairs and maintenance of potholes in car parks
17. Conducting unscheduled repairs and maintenance of damaged doors and windows
18. Conducting unscheduled repairs and maintenance of light fixtures
19. Conducting unscheduled repairs and maintenance of window furnishings
20. Conducting urgent repairs of electrical, plumbing and gas repair work
21. Conducting urgent repairs of fixing and replacing door and window locks (and keys)
22. Conducting urgent repairs of repairing roof leaks
23. Conducting urgent repairs of glazing
24. Conducting urgent repairs of graffiti removal

Tree maintenance

25. Conducting a visual inspection of all school ground trees weekly
26. Informing ICW immediately of any concerns they might have in relation to the safety of trees on school grounds and trees outside the school boundary with overhanging limbs
27. Monitoring the condition of trees after significant storm and wind events – and immediately isolating the area around any damaged tree that has the potential to harm students and staff
28. Contacting ICW immediately, requesting an approved contractor be organised to address the damage (and should ICW not be contactable – contacting a contractor directly)
29. Consulting with ICW when replanting or planting additional trees as part of grounds maintenance to ensure suitability of plantings (nb. school pays full cost of purchasing and planting new trees)

Bushfire ember zone protection

30. Arranging ember zone clean up prior to the official commencement of the bushfire season and prior to the ember zone audit
31. Paying the costs associated with any additional clean up works identified by the audit
32. Continuing to monitor ember zones for potential fire related risks – whether or not identified in the annual audit
33. Conducting regular maintenance of grounds to minimise the potential impact of bushfires on the school

Play and climbing equipment

34. Conducting routine (daily/weekly) inspection of the play equipment
35. Organising and paying for repairs and maintenance – both scheduled and unscheduled – including maintenance of sand pits and loose soft fall levels
36. Advising ICW when the repairs and maintenance undertaken in compliance with bi-monthly and annual condition reports are completed

Floor coverings³⁶

37. Reviewing the school's Asbestos Register to determine the likelihood of disturbing existing asbestos-containing flooring material (e.g.: Black Jack adhesive) and considering implications (including to cost) before any floor covering work is undertaken
38. Checking with ICW prior to seeking quotations for advice on any ACT school-wide contract arrangements in place
39. Placing purchase and installation orders directly with suppliers, at all times adhering to ACT Shared Services Procurement Guidelines
40. Coordinating the installation work at times that best suit the school
41. Ensuring that selected floor coverings and installation process undertaken by contractors are in compliance with relevant Australian Standards

Painting

42. Ensure all internal painting work is based on the most recent Building Condition Assessment Report and identified school-based priorities

³⁶ Manual gives extensive instruction regarding technical criteria for each floor covering type.

43. Developing a colour palette (approved jointly by the school community and ICW) when planning for large paint work that will significantly change the look and feel of a school or section of a school

Security systems and fire protection

44. Removing climbing points that assist intruders in getting over the security fence and/or give access to the roof of a building
45. Installing crimmesh and/or security film to windows and doors that be used by an intruder to gain access to a building
46. Installing night lighting around the external perimeter of all buildings
47. Ensuring the effective use of the electronic security system by staff, facility hirers, tenants and contractors and that they lock doors, windows and gates when they leave the site
48. Ensuring the electronic security system is armed at all times when the premises are unattended
49. Paying the cost of any security call out that results from the incorrect use of the system (e.g. unscheduled late close, or incorrect arming, or failure to disarm when they enter a building etc.)
50. Paying the cost of school holiday security patrols
51. Organising and paying for locks to doors and windows being kept in proper working order
52. Ensuring grounds are clear of items that may aid breaches of security (e.g. projectiles, ladders etc)
53. Maintaining perimeter security fences
54. Ensuring all building access locks (external doors and windows) comply with the ACT Government's property locking system
55. Liaising ACT Property Group locksmith (in house and contract) to conduct repairs and maintenance to locks
56. Establishing and maintaining a key register is for Key Control³⁷
57. Ensuring any external hirers of school facilities abide by the requirements of the Facility Hire Agreement
58. Paying the cost of false alarms caused by school (staff and students) and third parties (facility hirer)
59. Conducting visual inspection of extinguishers and hydrants/hose reels on a weekly basis to identify potentially non-functioning units
60. Paying costs associated with modifying the fire and emergency lighting systems when school-managed building modifications are undertaken
61. Paying costs associated with any act of vandalism i.e. discharging fire extinguishers or breaking detections systems

Electrical testing and tagging

62. Organising and paying the cost of electrical tagging and testing within their school
63. Ensuring that all electrical equipment and appliances are tested prior to use
64. Conducting ongoing monitoring of the condition of electrical appliances, including extension leads

Residual Current Device (RCD) testing

³⁷ Schools are responsible for costs associated with re-keying the entire site should an external key go missing.

- 65. Organising and paying for the routine RCD testing and upgrades within their school by a licensed electrical contractor or certified person
- 66. Paying the cost of replacing and upgrading electrical leads and equipment as required

Thermal imaging of electrical boards³⁸

- 67. Conducting regular visual monitoring of a school's electrical switch boards

Solar panel maintenance

- 68. Conducting regular cleaning of solar panels (utilising the ICW arranged contract)
- 69. Ensuring adherence to manufacturer/installer recommended procedures and guidelines
- 70. Conducting electrical connectivity inspection, repair and maintenance
- 71. Conducting regular visual inspections to check for defects such as cracks, chips or discolouration of the solar panels
- 72. Ensuring the DC/AC inverter is functioning correctly and that all switches, isolators, and circuit breakers are operating correctly
- 73. Ensuring all electrical connectors and cables/conduits are mechanically secure
- 74. Checking the structural integrity of the solar panel's mounting frames

Lights

- 75. Ensuring light fittings remain in good condition (and repairing as required)
- 76. Changing light bulbs as and when required
- 77. Taking opportunities whenever they arise to replace older, more energy intensive, light fittings and globes with lower energy, more environmentally friendly varieties

Water and sewer pipes

- 78. Undertaking regular visual inspection of wet areas to identify any plumbing concerns
- 79. Arranging and paying the cost of routine plumbing repairs and maintenance for taps, toilets, drinking fountains, hot water units, boiling water units
- 80. Paying costs associated with clearing blockages and other plumbing issues that are a result of the actions of students and staff
- 81. Maintaining the water reticulation network within the school
- 82. Paying the cost of water consumed

Stormwater collection system

- 83. Conducting daily monitoring of the stormwater reticulation network within the school and general clean ups relating to storm water runoffs
- 84. Monitoring and cleaning gutters, downpipes and stormwater pits (between ICW-arranged biannual cleans) to ensure that they are clear of any materials that may restrict or block the easy flow of stormwater
- 85. Cleaning and maintaining rainwater tanks

Gas services

- 86. Maintaining and repairing the gas reticulation network within the school

³⁸ ICW arranges and pays for thermal imaging.

87. Ensuring all gas equipment is kept in good serviceable order with regular maintenance and upkeep
88. Paying the cost of gas consumed (whether mains or bottled) associated with gas appliances
89. Promptly acting on any suspected gas leakages (whether from bottles or mains gas)

Heating

90. Paying operational utility costs relating to heating (gas, electricity)
91. Monitoring effective and efficient usage of the heating system by balancing the needs of the teaching environment with the significant utility costs associated with heating
92. Promptly reporting - to the ACT Property Group response centre - issues in relation to the operation of the school's heating system

Cooling

93. Monitoring effective and efficient usage of any installed air conditioning or cooling systems (evaporative cooling) in a school
94. Utilising the cooling system efficiently by balancing the needs of the teaching environment with the significant utility costs associated with cooling
95. Planting trees to provide natural shading to external windows and walls (particularly the East and West walls)
96. Promptly reporting - to the ACT Property Group response centre - issues in relation to the operation of the school's cooling system

Pest control

97. Regularly monitoring potential pest issues impacting the school premises and ensuring high risk areas are monitored frequently
98. Implementing a planned pest prevention strategy with a focus on minimising the need for chemical usage
99. Checking with ICW prior to seeking quotations for advice on any ACT school-wide contract arrangements in place related to pest control
100. Arranging pest control services as and when needed and paying the cost
101. Ensuring any AgVet eradication work is undertaken during times outside of school hours – e.g. during school holidays or on weekends

Window furnishings

102. Paying the cost to install, maintenance and upgrade all window furnishings
103. Checking with ICW prior to seeking quotations for advice on any ACT school-wide contract arrangements in place related to window furnishings

Utilities

104. Paying the cost of a school's utility usage
105. Ensuring the efficient and effective management of energy and water usage
106. Contributing to environmental sustainability outcomes of the Directorate and the ACT Government

Waste removal and recycling

107. Paying the cost of waste removal from school premises (including grease traps)

108. Minimising the amount of waste generated at the school (in particular the waste that goes to landfill)
109. Maximising recycling outcomes

Disposal of chemicals and other hazardous waste

110. Ensuring that all hazardous substances are stored and disposed of in accordance with the ACT Dangerous Substances Act 2004 and the ACT Work Health and Safety Act 2011
111. Paying the cost of the appropriate disposal of hazardous waste from the school site

Roof access safety system

112. Organising and paying the cost to train building services officer to work at heights
113. Ensuring no person (including contractors or staff) utilises the Roof Access Safety System if the System certification is not current
114. Ensuring no person (including contractors and staff) utilises the Roof Access Safety System unless they have current certification to work at heights
115. Ensuring that a person (including contractors and staff) who has current certification to work at heights must use the safety harness whilst on the roof
116. Purchasing and maintaining an extension ladder
117. Ensuring the storage and maintenance of the safety harness
118. Paying the cost to replace safety harness when it is not adequately maintained or is lost

Issues identified by Building Condition Assessments³⁹

119. Utilising the Building Condition Assessment to prioritise forward repairs and maintenance schedule
120. Undertaking any urgent work identified in the Building Condition Assessment in a timely manner

Asbestos

121. Being aware of the location of all identified asbestos material at the school and advising all contractors and staff working on site
122. Advising ICW immediately of any disturbance of asbestos (both friable and non-friable)
123. Ensuring the disturbed area is immediately isolated
124. Paying the cost of removing known asbestos containing materials (as per the current Asbestos Register) if disturbed whilst undertaking school managed repairs, maintenance or upgrade work

Ozone depleting substances

125. Consulting with ICW immediately if any suspected hazardous material is identified to discuss the best course of action for management and disposal
126. Ensuring the area of identified hazardous material is immediately isolated until a management plan is enacted

³⁹ BCAs are conducted every three years by ICW.

Hydrotherapy pool⁴⁰

127. Managing the use of the pool by students with disabilities and for other therapeutic purposes
128. Maintaining, managing and administrating pool facilities
129. Ensuring pools hired to external organisations are used only for people with a disability, those rehabilitating after surgery and those who would benefit from the therapeutic properties of a hydrotherapy pool
130. Ensuring that the pool is operated and maintained in accordance with AS 3979:1993 and the ACT Code of Practice
131. Paying the costs associated with operating the pool (e.g. heating, chemicals), maintaining water quality and the maintenance of the water filtration system

Furniture

132. Repairing and maintaining existing furniture and purchasing new furniture, except for new schools/new transportables, or major upgrade managed by ICW (nb. ICW does not pay for new furniture where an existing area is being upgraded)

Lifts and automatic doors

133. Monitoring the operation of their lifts and automatic doors daily and promptly reporting any issues or concerns with their operation immediately to ICW
134. Paying the cost of repairing a lift or automatic door if it is damaged by students or staff
135. Ensuring lifts are only used by students and visitors with a disability, elderly visitors and staff⁴¹
136. Advising ICW if the school wants to install a new automatic door as part of a school-managed upgrade project for ICW to provide advice on preferred manufacturers, quality and installers (contractors)

⁴⁰ Four schools in the ACT public school system have hydrotherapy pools. They are included here to highlight the additional infrastructure requirements of facilities like these, which may become more common as more students with disability attend non-specialist schools.

⁴¹ ICW will pay the full cost of a new automatic door only at the school's main entry and where access to another building is required for a student with a disability. This has implications for inclusion.