



youth coalition

of the ACT

**Submission to the Department of Education and
Training Policy Supporting Changes to the
Education Act 2004**

May 2010

www.youthcoalition.net

The Youth Coalition of the ACT acknowledges the Ngunnawal people as the traditional owners and continuing custodians of the lands of the ACT and we pay our respects to the Elders, families and ancestors.

We acknowledge that the effect of forced removal of Indigenous children from their families as well as past racist policies and actions continues today.

We acknowledge that the Indigenous people hold distinctive rights as the original people of modern day Australia including the right to a distinct status and culture, self-determination and land. The Youth Coalition of the ACT celebrates Indigenous cultures and the invaluable contribution they make to our community.

Submission to the Department of Education and Training
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May 2010

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1. Introduction

Section 1 of this submission provides contextual information about Youth Coalition of the ACT (Youth Coalition), an overview of young people and education and the process by which this submission was developed.

1.1 Youth Coalition of the ACT

The Youth Coalition of the ACT is the peak youth affairs body in the ACT. Comprised of 90 members, programs, and individuals the Youth Coalition is responsible for representing and promoting the interests and wellbeing of people aged between 12 and 25 years and those who work with them.

The Youth Coalition is represented on many ACT Government Advisory structures and provides advice to the ACT Government on youth issues as well as providing information to youth services about policy and program matters.

A key role of the Youth Coalition is the development and analysis of ACT social policy and program decisions for young people and youth services. The Youth Coalition facilitates the development of strong linkages and promotes collaboration between the community, government and private sectors to achieve better outcomes for young people in the ACT.

1.2 Young People and Education

Increasing educational participation is highlighted as a goal in the Canberra Social Plan. Education provides pathways for young people to explore and build their capacity through academic achievement and skill development that may enable social development, community participation and economic outcomes for individuals and the community as a whole.

The International Convention on Economic, Social and Cultural Rights¹ states that accessible, affordable and high quality education is a right to be enjoyed by all members of Australian society.

All young people have the right to development opportunities and education should provide a pathway directed at the full development of young people. Furthermore, access to education and different forms of education are the basis for enabling participation by all young people.

1.3 Process for Developing and Format of this Submission

The Youth Coalition welcomes the opportunity to contribute to the Department of Education and Training's (the Department) Draft Suite of Policies (the draft Policy Suite). We would like to congratulate the ACT Government on its commitment to progressing the educational interests of young people through the development of the Policies.

This submission is one of many made over a ten year period by the Youth Coalition and is based on the following:

- The priority areas highlighted in the *Youth Coalition Strategic Plan 2007-10*;
- The policy positions outlined in the *Youth Coalition Policy Platform*;

¹ United Nations (1966) International Convention on Economic, Social and Cultural Rights, Office of United Nations, High Commissioner for Human Rights

- The views of participants of the Youth Coalition's Biennial Policy Forum;
- The issues raised at consultations on the 2010/11 ACT Government Budget;
- Consultations with services to inform the Youth Coalition's submission to the *Inquiry into the Educational Achievement Gap (2009)*;
- Consultations with services to inform the Youth Coalition's submission to the *Inquiry into Supporting Students with Disability (2010)*;
- Issues raised by service providers during Youth Coalition forums where the Department of Education and Training presented information regarding the changes into the education attainment and transitions (2010);
- The issues raised at consultation on the *ACT Young People's Plan 2009 – 2014*;
- Previous Youth Coalition submissions to the ACT Government;
- One-on-one consultations with member services and organisations; and,
- Current and topical research on youth affairs.

This submission has been divided into 11 sections, which include the following:

1. Introduction (this section)
2. Summary of recommendations
3. Overarching Comments
4. Policy: Enrolment in ACT Public Schools
5. Policy: Attendance at ACT Public Schools; and, Policy: Attendance at Non – Government Schools
6. Policy: Suspension, Exclusion or Transfer of Students in ACT Public Schools
7. Policy: Education Participation Requirements
8. Policy: Post Year 10 Alternatives
9. Policy: Education Options
10. Policy: Exemption Certificates
11. Conclusion

This submission represents an opportunity for the Youth Coalition and stakeholders to identify and advise ACT Government of emerging issues, areas in need of additional resources and collaboratively develop social policy in the ACT.

2. Summary of Recommendations

Recommendation 1

That the definition of children and young people in the Department of Education and Training Policy Suite is consistent with other ACT Government policy definition of those terms.

Recommendation 2

That the definition of parent in the Department of Education and Training Policy Suite is expanded to recognise that some young people have complex family situations.

Recommendation 3

That the Department of Education and Training develop an overarching document that provides a context for and introduction to the Policy Suite; which includes an overview of the changes to education attainment requirements in the ACT, and rationale for the policies contained in the suite.

Recommendation 4

That each policy contained within the Department of Education and Training Policy Suite includes clear cross-referencing with all other policies in the suite.

Recommendation 5

That the Department of Education and Training utilise specific awareness raising strategies for young people and their families who may experience difficulties in relation to education attainment in the ACT or who may be experiencing other disadvantage.

Recommendation 6

That the Department of Education and Training provide, with the Policy Suite, information on how these policies will be implemented, resourced, and promoted.

Recommendation 7

That Department of Education and Training staff who may be working directly with young people and their families, carers and other supports, receive specific training and professional development relating to the implementation of the policies contained in the Policy Suite, particularly relating to working with young people and families those experiencing disadvantage.

Recommendation 8

That the Department of Education and Training facilitate access to information and support relating to education attainment requirements for young people at local ACT Government Shopfronts and Centrelink offices.

Recommendation 9

That the Department of Education and Training employ evidenced based strategies to support the engagement of young people in education attainment.

Recommendation 10

That clear, concise information about any liabilities, penalties, and compliance related to the Department of Education and Training Policy Suite, is targeted and provided to young people and their families.

Recommendation 11

That the Department of Education and Training clarify who is liable for penalties in situation where young people are living in non mainstream circumstances, such a care, living with friends or other relatives, homelessness, or independent living.

Recommendation 12

That the Department of Education and Training policy *Enrolment in ACT Public Schools (Preschool to Year 12)* include:

- Policy and procedure outlining who is responsible for the enrolment of young people who do not live with their parents;
- Provisions for young people whose circumstance may mean they move residences frequently; and
- Processes for young people who may not have access to evidence required to enrol, including proof of age, identity, or proof of residence.

Recommendation 13

That the Department of Education and Training clarify who is responsible for young people who are living in non mainstream circumstances, such a care, living with friends or other relatives, homelessness, or independent living.

Recommendation 14

That the Department of Education and Training policies regarding school attendance include specific processes to support students to maintain attendance at school, prior to issuing a Compliance Notice to their parents/guardians; and after a Compliance Notice has been issued, to support young people and families to comply.

Recommendation 15

That the Department of Education and Training include the following 'reasonable excuses' in provisions for students to be absent from school:

- Young people with caring responsibilities; who may be caring for a family member with a disability, mental illness or alcohol and other drug issue;
- Young people who are experiencing or at risk of homelessness;
- Young people experiencing health issues, including alcohol and other drug issues and mental health issues;
- Young people experiencing family conflict;
- Young people in care;
- Young people with parental responsibilities;
- Young people with Cultural and/or Religious responsibilities; and
- Newly arrived young people.

Recommendation 16

That the Department of Education and Training clarify what 'approaching adulthood' means and the criteria that will be used to determine when a young person may be considered to be 'approaching adulthood'.

Recommendation 17

That the Department of Education and Training provide information regarding the mechanisms that will be in place to assist schools in identifying appropriate supports for individual young people who are suspended, and their families.

Recommendation 18

That the Department of Education and Training clarify the conditions under which the Chief Executive can give Principals authority to for suspension.

Recommendation 19

That the Department of Education and Training identify any professional development needs for Principals and Deputy Principals in response to the extended periods of suspension.

Recommendation 20

That the Department of Education and Training outline what networks, procedures and Memorandums of Understanding (MOUs) will need to be in place to ensure support plans for young people who are suspended are achieved.

Recommendation 21

That the Department of Education and Training clarify what assistance will be offered to young people and their families who are attending 'appropriate counselling' and how appropriateness will be determined.

Recommendation 22

That the Department of Education and Training establish support processes to assist young people to continue curriculum engagement while suspended.

Recommendation 23

That the Department of Education and Training clarify how any transfer period due to entrenched behaviours, may affect the young person's standing with other compulsory education attainment requirements.

Recommendation 24

That the Department of Education and Training articulate what criteria an exclusion from all public schools must be based on.

Recommendation 25

That the Department of Education and Training ensure that community based services, such as youth homelessness service providers do not receive fines on behalf of young people they are supporting.

Recommendation 26

That the Department of Education and Training clarify the role of ACT Policing in supporting young people to participate in education.

Recommendation 27

That the Department of Education and Training clarify the difference between an 'Information Notice' and an 'informal contact'.

Recommendation 28

That the Department of Education and Training apply a period of grace to young people who are engaging in employment, but may not have a 25 hour a week contract initially.

Recommendation 29

That the Department of Education and Training reconsider the timeframe for processing applications to recognise that young people may need to take up employment when it is offered.

Recommendation 30

That the definition of an Education Provider is expanded to encapsulate youth support services that provide structured programs for young people.

Recommendation 31

That the Department of Education and Training clarify what constitutes 'reasons which indicate it is not appropriate to require parental consent.'

Recommendation 32

That the Department of Education and Training establish a solid framework and process for responding to exemption applications in a timely manner and include specific provisions to ensure accessibility for young people and their families, including:

- Re-starting the two-week grace period in the event that an incomplete application is returned;
- Pre-approved exemptions as an interim measure when further information is being sought;
- Notifying applicants of the status of their application.

Recommendation 33

That the Department of Education and Training develop a comprehensive framework to support the assessment of applications for Exemption Certificates that provides the breakdown of how 'best interest' principles will be applied.

Recommendation 34

That the Department of Education and Training ensure that support is available and offered to the parents and/or guardians of a young person to ensure that they are fully aware of and understand requirements pertaining to Exemption Certificates.

3. Overarching Comments

Section 3 of this submission provides some overarching comments in relation to the draft Suite of Policies, as prepared by the Department.

3.1 Definitions

The Youth Coalition identified a number of definitions that require further clarification.

3.1.1 Definition of Children and Young People

The Youth Coalition is concerned that the language utilised in the Draft Policy Suite, relating to children and young people, is inconsistent with definitions adopted by the ACT Government.

The ACT Government defines a child as aged 0 – 11 years, and a young person as aged 12 – 25 years of age;² which has not been clearly delineated within the Draft Policy Suite. The clear identification of these two groups will ensure the Policy is consistent with the ACT Government policy, and ensure that policies pertaining specifically to age-related requirements are easier to understand.

3.1.2 Definition of Parent

The Youth Coalition acknowledges the Department's definition of parent in the Draft Policy Suite. However we raise concerns over how this definition relates to young people living in non-mainstream circumstances, such as young people in care, experiencing homelessness, young people living with friends or other families, or living independently. These complex definitions may have a negative impact on young people and their identified parent and/or carer including, but not limited to, confusion in relation to roles and responsibilities.

Recommendation 1

That the definition of children and young people in the Department of Education and Training Policy Suite is consistent with other ACT Government policy definition of those terms.

Recommendation 2

That the definition of parent in the Department of Education and Training Policy Suite is expanded to recognise that some young people have complex family situations.

3.2 Developing a Cohesive Policy Suite

3.2.1 Overview and Rationale

The Youth Coalition is pleased that the Department has endeavoured to develop a number of policies and procedures that are comprehensive and seek to address areas relating to the legislative changes to the education attainment and transitions for young people in the ACT.

It is essential that to support this, the Department develop an overarching document that provides a context for and introduction to the Policy Suite; which includes an overview of the changes, and rationale for the policies.

² ACT Government (2010) *ACT Young People's Plan 2009 – 2014*, Canberra

Recommendation 3

That the Department of Education and Training develop an overarching document that provides a context for and introduction to the Policy Suite; which includes an overview of the changes to education attainment requirements in the ACT, and rationale for the policies contained in the suite.

3.2.2 Cross-referencing with Related Policies

The Youth Coalition acknowledges the need for a Policy Suite to support the changes in education attainment and transitions, and believe that these policies should include clear cross-referencing or further information regarding their impact on or relationship to one another. It is recommended that these be included in addition to any lists of related policies at the end of individual draft Policies.

Recommendation 4

That each policy contained within the Department of Education and Training Policy Suite includes clear cross-referencing with all other policies in the suite.

3.2.3 Implementation of the Policy

The Youth Coalition seeks further information on how the Policy Suite will be implemented and promoted.

In addition, it is important that the Department utilise specific awareness raising strategies for young people and their families who may experience difficulties in relation to education attainment and transitions in the ACT or who may be experiencing disadvantage, to ensure they do not face additional barriers to accessing education opportunities.

The Youth Coalition would like to highlight the importance of ensuring that Departmental staff who may be working directly with young people and their families, carers and other supports, must receive specific training and professional development relating to this work. It is vital that staff have a comprehensive knowledge base that will enable them to make effective referrals to and/or work collaboratively with support services.

The Youth Coalition calls upon the Department to provide further information about which agencies or programs they will be working with and referring to, and the processes by which this will occur.

Recommendation 5

That the Department of Education and Training utilise specific awareness raising strategies for young people and their families who may experience difficulties in relation to education attainment in the ACT or who may be experiencing other disadvantage.

Recommendation 6

That the Department of Education and Training provide, with the Policy Suite, information on how these policies will be implemented, resourced, and promoted.

3.3 Access

The Youth Coalition acknowledges the initial information disseminated in relation to the changes in education attainment and transitions, including:

- Pamphlets;
- Letters to parents;
- Email Contact;
- Newspaper Advertisements;
- Posters; and,
- Telephone Hotline.

We would encourage the Department to continue to review communication methods with the target group(s), and highlight the importance of utilising appropriate mediums for differing target groups (e.g. parents, young people, and youth services). For example, it may be useful for young people and parents to be able to access information and support relating to the education attainment and transitions, at local ACT Government Shopfronts and Centrelink offices.

In addition, the Youth Coalition highlights the challenges that some young people experience in accessing support services. Many young people experience disadvantage due to a range of structural and systemic issues; and may require specific supports to access equal opportunities.

Recommendation 7

That Department of Education and Training staff who may be working directly with young people and their families, carers and other supports, receive specific training and professional development relating to the implementation of the policies contained in the Policy Suite, particularly relating to working with young people and families those experiencing disadvantage.

Recommendation 8

That the Department of Education and Training facilitate access to information and support relating to education attainment requirements for young people at local ACT Government Shopfronts and Centrelink offices.

3.4 Penalties, Enforcement and Liability

The Youth Coalition does not believe that financial penalties are the most appropriate or effective way to engage young people in education and/or sustain that engagement. If a young person is not complying, it is an opportunity to employ positive strategies to engage that young person in a more meaningful manner. All Policies in the Suite should include specific processes to support this, prior to the Department engaging in a punitive approach. The Youth Coalition supports the use of evidenced based approaches to engagement of young people in education.

Information in relation to the enforcement of penalties has been limited and vague. During the process of responding to this submission, it was difficult to obtain information about compliance and penalty units. The Youth Coalition is concerned that this information is not readily accessible, including to those who would be potentially liable. We urge the Department to provide clear and concise information pertaining to penalties and specific costs associated with these.

The Youth Coalition is concerned that families are liable for a monetary punishment if they do not comply with the Compliance Notice, of up to 10 penalty units. According

to the Legislation Act 2004, 1 penalty unit for an individual is equivalent to \$110, which means that families may receive fines for up to \$1,100. This could have significant negative consequences for young people and their families, including financial difficulties and/or poverty, family conflict, and associated issues; and highlights the importance of ensuring that strategies are identified and implemented to support the young person and family, prior to crisis point.

Additionally, the Youth Coalition seeks further clarification as to what party is financially responsible for young people who are not living with their parents; for example; young people in care, experiencing homelessness, living with friends or other families, or living independently. We acknowledge that the Department anticipates this measure will be applied as the least preferred method, however we note the lack of accountability to support this. We urge the Department to ensure that there is a strong framework with appropriate supports and mechanisms to ensure that this method really is the least preferred measure.

Recommendation 9

That the Department of Education and Training employ evidenced based strategies to support the engagement of young people in education attainment.

Recommendation 10

That clear, concise information about any liabilities, penalties, and compliance related to the Department of Education and Training Policy Suite, is targeted and provided to young people and their families.

Recommendation 11

That the Department of Education and Training clarify who is liable for penalties in situation where young people are living in non mainstream circumstances, such a care, living with friends or other relatives, homelessness, or independent living.

4. Policy: Enrolment at ACT Public Schools

Section 4 of this submission responds to the draft policy *Enrolment in ACT Public Schools (Preschool to Year 12)* (the draft Policy).

4.1 Definitions

There are some definitional concerns within this policy in relation to the definition of children and young people. For more information, please refer to Section 3.1 of this submission.

4.2 Issues and Concerns

The Youth Coalition supports the inclusion of this draft Policy in the Department Policy Suite, to clearly articulate the policy and procedure for enrolling students in ACT public schools.

4.2.1 Supporting Specific Target Groups of Young People

The Youth Coalition supports the inclusion of processes in the draft Policy relating to the needs of students experiencing specific issues, such as disability.

In addition, the Policy should provide further clarification on the processes for other groups of young people, including but not limited to those who may be experiencing homelessness, or who are involved in the Care and Protection Services system.

The draft Policy states that during the enrolment process, the following procedures must be followed:

- It is the statutory responsibility of the parents to enrol the student (Section 1.3 and Section 4.6.1);
- Students are given priority to attend school in their Priority Enrolment Area (Section 1.8);
- Priority will be given to students who live in the ACT (Section 4.11.1), with 'living in the ACT' defined as having resided in the ACT for at least 1 month (Section 3.13); and,
- Evidence of proof of age and where the student lives must be provided upon enrolment (Section 4.11.2).

In light of the policies highlighted above, the Youth Coalition has identified a number of issues relating to young people who may be experiencing homelessness, or involvement in the Care and Protection Services system, for consideration in the further development of the Policy:

- The draft Policy should include a policy and procedure outlining who is responsible for the enrolment of young people who do not live with their parents; who may be supported youth accommodation or placed in care;
- Young people in the ACT who are experiencing homelessness or are in foster care may move residences frequently, including to regional NSW outside of the ACT. The Policy should include specific provisions for these young people,

to ensure that these circumstances do not provide a barrier to their enrolment at an ACT public school. It should include processes for both young people who may want to change schools, due to a change in their circumstances, or who would like to maintain their enrolment at one school, even if it is no longer in their Priority Enrolment Area.

- Young people who are experiencing homelessness, are involved in the Care and Protection Services system, and Aboriginal and Torres Strait Islander young people may not have access to evidence required to enrol, including proof of age, identity, or proof of residence. The Policy should include specific processes for these young people, to ensure that these circumstances do not provide a barrier to their enrolment.

4.3 Implementation of the Policy

The Youth Coalition seeks further information on how the Policy will be implemented and promoted. It is vital that enrolment procedures are clearly articulated, with the aim of ensuring that the process is simple and streamlined. For more information, please refer to Section 3.2.3 of this submission.

In addition, it is important that the Department utilise specific awareness raising strategies for young people and their families who may experience difficulties enrolling at ACT public schools or who may be experiencing disadvantage, to ensure they do not face additional barriers to accessing ACT public education opportunities.

Recommendation 12

That the Department of Education and Training policy *Enrolment in ACT Public Schools (Preschool to Year 12)* include:

- Policy and procedure outlining who is responsible for the enrolment of young people who do not live with their parents;
- Provisions for young people whose circumstance may mean they move residences frequently; and
- Processes for young people who may not have access to evidence required to enrol, including proof of age, identity, or proof of residence.

5. Policy: Attendance at ACT Public Schools; and, Policy: Attendance at Non-Government Schools

Section 5 of this submission responds to the draft policies *Attendance at ACT Public Schools*, and *Attendance at ACT Non-Government Schools* (the draft Policies).

5.1 Definitions

There are some definitional concerns within these policies in relation to the definition of children and young people. For more information, please refer to Section 3.1.1 of this submission.

5.2 Issues and Concerns

The Youth Coalition supports the inclusion of these draft Policies in the Department's Policy Suite, to clearly articulate the policy and procedure for attendance in both ACT Public Schools and Non-Government Schools, for students in the ACT.

5.2.1 Statutory Responsibilities for Young People

The draft Policies state that it is the responsibility of students' parents to ensure attendance at the schools at which they are enrolled, outlined in Section 1.1 of each draft Policy. While the Youth Coalition supports the notion that young people are not solely responsible for their attendance, we recommend that the Policies include further clarification as to who is responsible for young people who may not be in the care of their parents (for example, in a youth refuge, Care and Protection Services system, living with friends or other families, or living independently).

Compliance Notices

The Youth Coalition supports the notion that young people are not solely responsible for their attendance at school; however, we raise a number of issues related to the usage of Compliance Notices.

The Youth Coalition believes that the Policies should include specific processes to support students to maintain attendance at school, prior to issuing a Compliance Notice to their parents/guardian; and after it has been issued, to support young people and families to comply.

These processes should include the involvement of school welfare and pastoral teams, to provide support to young people. Young people experiencing specific issues relating to socio-economic disadvantage, health, housing, family conflict or other may experience significant barriers to maintaining their attendance at school. The Youth Coalition believes that where a Compliance Notice has been, or is going to be, issued, members of the school welfare or pastoral care teams must be available to support the young person and their family.

The Youth Coalition is concerned that families are liable for a monetary punishment if they do not comply with the Compliance Notice, of up to 10 penalty units. According to the Legislation Act 2004, 1 penalty unit for an individual is equivalent to \$110, which means that families may receive fines for up to \$1,100. This could have significant negative consequences for young people and families, including financial difficulties and/or poverty, family conflict, and associated issues; and highlights the importance of ensuring that strategies are identified and implemented to support the young person and family, prior to crisis point.

Additionally, the Youth Coalition seeks further clarification as to what party is financially responsible for young people who are not living with their parents; who may be in care or experiencing homelessness, or living independently. The Youth Coalition is seriously concerned community-based services, such as youth refuges, may receive fines on behalf of young people they are supporting. Community-based youth services often run on limited funding and are likely not to be in a position to pay these fines. On the other hand, the Youth Coalition would not support the issuing of these fines to young people either, as this will likely further exacerbate the issues and challenges they may be experiencing.

Recommendation 13

That the Department of Education and Training clarify who is responsible for young people who are living in non mainstream circumstances, such a care, living with friends or other relatives, homelessness, or independent living.

Recommendation 14

That the Department of Education and Training policies regarding school attendance include specific processes to support students to maintain attendance at school, prior to issuing a Compliance Notice to their parents/guardians; and after a Compliance Notice has been issued, to support young people and families to comply.

5.2.2 Reasonable Absences from School

The Youth Coalition is pleased that the draft Policies include provisions for students to be absent from school, provided they have a 'reasonable excuse' (Section 5.3). We recommend that the following considerations also be added to the list of 'reasonable excuses', in order to identify and provide equitable provisions for those young people who may experience additional difficulties in attending school due to disadvantage:

- Young people with caring responsibilities; who may be caring for a family member with a disability, mental illness or alcohol and other drug issue;
- Young people who are experiencing homelessness, or at risk of experiencing homelessness;
- Young people experiencing health issues, including alcohol and other drug issues and mental health issues;
- Young people experiencing family conflict;
- Young people in care;
- Young people with parental responsibilities;
- Young people with cultural and/or religious responsibilities; and
- Newly arrived young people.

Recommendation 15

That the Department of Education and Training include the following 'reasonable excuses' in provisions for students to be absent from school:

- Young people with caring responsibilities; who may be caring for a family member with a disability, mental illness or alcohol and other drug issue;
- Young people who are experiencing, or at risk of homelessness;
- Young people experiencing health issues, including alcohol and other drug issues and mental health issues;
- Young people experiencing family conflict;
- Young people in care;
- Young people with parental responsibilities;
- Young people with Cultural and/or Religious responsibilities; and
- Newly arrived young people.

5.2.3 Attendance Records and Documentation

The Youth Coalition understands the importance of keeping school attendance records and documentation, particularly if these mechanisms allow the school to identify students that require additional support to maintain attendance.

However, we would like to highlight the importance of respecting students' confidentiality and the sensitivity to the issues they may be experiencing. We recommend that further information be provided in these Policies as to what mechanisms will be put in place to ensure that confidentiality is respected, while ensuring that students still receive necessary supports.

5.3 Implementation of the Policy

The Youth Coalition seeks further information on how the Policy will be implemented and promoted. It is vital that attendance policies and procedures are clearly articulated, with the aim of ensuring that the process is simple and streamlined. For more information, please refer to Section 3.2.3 of this submission.

6. Policy: Suspension, Exclusion or Transfer of Students in ACT Public Schools

Section 6 of this submission responds to the draft policy *Suspension, Exclusion or Transfer of Students in ACT Public Schools* (the draft Policy).

6.1 Definitions

There are some definitional concerns within this policy in relation to the definition of:

- Children and young people; and
- Parent.

For more information, please refer to Section 3.1 of this submission.

Within the context of this draft Policy, the Youth Coalition is also concerned about the lack of a definition for 'approaching adulthood'.³ Whilst we acknowledge the inclusion of a support person who may attend proceedings, further clarification is sought in relation to what 'approaching adulthood' means and the criteria that will be used to determine when a young person may be considered to be 'approaching adulthood'.

Recommendation 16

That the Department of Education and Training clarify what 'approaching adulthood' means and the criteria that will be used to determine when a young person may be considered to be 'approaching adulthood'.

6.2 Issues and Concerns

The Youth Coalition of the ACT acknowledges the need for schools to provide a safe and supportive environment for all students and teachers. We acknowledge that this transitional policy reflects the effort of the Department to foster this environment. However we have concerns over the inclusion of this draft Policy.

6.2.1 Policy Statement

The continuous suspension of a young person for 20 days has ramifications that this transitional policy does not adequately address. The strain placed on families to support a young person during school hours over this time period can be substantial. The assistance required to maintain a meaningful workload that will contribute to the curriculum has not been identified. Further information as to what mechanisms will be in place to assist schools in identifying appropriate supports for individual young people is required. We also seek further information on how this policy will impact on and/or interact with the other educational pathway policies proposed.

The Youth Coalition seeks further information on how the behaviour support plan may have been modified to be responsive to the transitional policy's proposals. We also seek to clarify what community resources, and by what methods, the Department will engage to inform the behaviour support plan. The Youth Coalition calls for the behaviour support plan to clearly articulate the responsibilities that agencies engaged will have to support young people who are suspended, excluded, or transferred.

³ Contained in Attachment B of the Policy: Suspension, Exclusion or Transfer of Students in ACT Public Schools

Recommendation 17

That the Department of Education and Training provide information regarding the mechanisms that will be in place to assist schools in identifying appropriate supports for individual young people who are suspended, and their families.

6.2.2 Authority

The draft Policy refers to the authority given to Principals, and potential acting Principals, by the Chief Executive, to suspend, transfer or exclude students. The Youth Coalition seeks clarification as to under what conditions the Chief Executive may delegate this power.

Recommendation 18

That the Department of Education and Training clarify the conditions under which the Chief Executive can give Principals authority to for suspension.

Recommendation 19

That the Department of Education and Training identify any professional development needs for Principals and Deputy Principals in response to the extended periods of suspension.

6.2.3 Rationale

The Youth Coalition strongly supports the Department's commitment to providing a safe working environment for students and staff; however, the parameters of this are clearly articulated within the context of support plans. The Department must outline what networks, procedures and Memorandums of Understanding (MOUs) will need to be in place for this to happen.

Recommendation 20

That the Department of Education and Training outline what networks, procedures and Memorandums of Understanding (MOUs) will need to be in place to ensure support plans for young people who are suspended are achieved.

6.2.4 Procedures

The Department needs to identify and provide further information on what assistance will be offered to young people and their families who are attending 'appropriate counselling' (for students who have been suspended for 7 or more days). The Department needs to clarify what is considered by 'appropriate', and identify what (if any) conditions will be placed on service providers to engage with the Department around reporting. Additionally, information should be provided on whether non-compliance with a referral offered by a school may impact on young people's suspension.

The Youth Coalition also seeks clarification from the Department relating to how schools, and the Department, will engage with non-traditional legal guardians of young people in these situations.

Recommendation 21

That the Department of Education and Training clarify what assistance will be offered to young people and their families who are attending 'appropriate counselling' and how appropriateness will be determined.

6.2.5 Suspensions for up to 15 days

It is essential that the Department consider the difficulties some young people and families may have in maintaining engagement with a school curriculum, if they are suspended for any length of time. The Youth Coalition recommends that the Department establish supports that will assist young people to study from home, or at an alternative location.

Additionally, we request further information relating to whether a young person's return to school will be affected by not completing their workload during the suspension period.

Appeals Process

The Youth Coalition is pleased that there is access to a complaints and appeals process. It is the recommendation of the Youth Coalition that information pertaining to this process, including appropriate forms, timelines and possible outcomes is made available to young people, their families and/or carers and any other relevant stakeholders.

Request for additional days of suspension

Further information is required as to what criteria a Principal's decision to request an additional five days of suspension can be based upon. The Youth Coalition recommends that the Department provide a clear framework and timeframe articulating the processes by which the Chief Executive will review these requests.

Recommendation 22

That the Department of Education and Training establish support processes to assist young people to continue curriculum engagement while suspended.

6.2.5 Re-entry

The Youth Coalition acknowledges the importance placed on the re-entry meetings that are convened on a student's return from suspension. Specific engagement methods will need to be considered in linking young people with appropriate support agencies.

6.2.6 Transfer

The Youth Coalition has significant concerns about the success of transfers. We seek clarification as to what supports and mechanisms have been developed and implemented to support a young person and their parent and/or carer to approach, and subsequently integrate successfully with a new education provider.

The Youth Coalition believes that more information is required in relation to the processes outlined in the draft Policy. In particular, a greater understanding of what processes are in place to identify entrenched behaviour when considering transfer of a student, and what educational and community resources are used to address this behaviour.

We also seek clarification as to how this period may affect the young person's standing with other compulsory education requirements.

An area that has not been adequately considered within the draft Policy is the impact of suspension upon a young person receiving Centrelink payments. The Youth Coalition believes that receiving a breach from Centrelink on top of suspension would not be conducive to ensuring a young person will re-engage with education; especially young people who are living independently with specific financial obligations. Furthermore, we seek clarification on the proposed timeline on the transfer of a student; and believe that this timeline should not exceed the length of a suspension as set out in the transitional policy. Student transfers should be viewed as a positive mechanism to keep young people engaged in education, and should therefore not exceed the maximum suspension period.

Recommendation 23

That the Department of Education and Training clarify how any transfer period due to entrenched behaviours, may affect the young person's standing with other compulsory education attainment requirements.

6.2.7 Exclusion

The International Convention on Economic, Social and Cultural Rights⁴ stipulates that accessible, affordable and high quality education is a right to be enjoyed by all members of Australian society. Exclusion from education is not only a severe action, but also a direct breach of the Covenant which Australia is party to. The Youth Coalition calls on the Department to clearly articulate upon what criteria an exclusion from all public schools must be based upon.

The Youth Coalition believes that an Exclusion is an indication of a systemic failure; and therefore it is essential that the system will support young people who have been excluded, to meet their legal requirements ensure that the Department do not 'drop the baton'. We call on the Department to continue to provide young people who have been excluded with the opportunity to apply for an approval notice and/or exemption certificate.

Recommendation 24

That the Department of Education and Training articulate what criteria an exclusion from all public schools must be based on.

6.3 Implementation of this Policy

The Youth Coalition seeks further information on how the Policy will be implemented and promoted. It is vital that suspension, expulsion, transfer and exclusion procedures are not used in place of supporting young people who are harder to engage. For more information, please refer to Section 3.2 of this submission.

⁴ United Nations (1966) International Convention on Economic, Social and Cultural Rights, Office of United Nations, High Commissioner for Human Rights

7. Policy: Education Participation Requirements

Section 7 of this submission responds to the draft policy *Education Participation Requirements* (the draft Policy).

7.1 Definitions

There are some definitional concerns within this policy in relation to the definition of children and young people. For more information, please refer to Section 3.1 of this submission.

7.2 Issues and Concerns

The Youth Coalition supports the inclusion of this draft Policy in the Policy Suite, to clearly articulate Education Participation Requirements for students in the ACT.

7.2.1 Issuing Information Notices and Compliance Notices

The Youth Coalition supports the notion that young people are not solely responsible for their attendance at school; however, we raise a number of issues related to the usage of Information Notices and Compliance Notices, as discussed in Section 3.4 of this Submission.

Compliance Notice Penalties

The Youth Coalition is concerned that families are liable for a monetary punishment if they do not comply with the Compliance Notice, of up to 10 penalty units. According to the Legislation Act 2004, 1 penalty unit for an individual is equivalent to \$110, which means that families may receive fines for up to \$1,100. This could have significant negative consequences for young people and families, including financial difficulties and/or poverty, family conflict, and associated issues; and highlights the importance of ensuring that strategies are identified and implemented to support the young person and family, prior to crisis point.

Information Notice Penalties

It is unclear what the penalty is for non-compliance with an Information Notice.

Additionally, the Youth Coalition seeks further clarification as to what party is financially responsible for young people who are not living with their parents; who may be in the care and protection system, experiencing homelessness, living with friends or other families, or living independently (please refer to Section 3.6 of this submission for more information).

7.2.2 Community Based Services

The Youth Coalition calls on the Department to ensure that community-based services, such as youth homelessness services, may receive fines on behalf of young people they are supporting. Community-based youth services often run on limited funding and are not in a position to pay these fines, nor should they be.

Equally, the Youth Coalition would not support the issuing of these fines to young people, as this will likely further exacerbate the issues and challenges they may be experiencing.

Recommendation 25

That the Department of Education and Training ensure that community based services, such as youth homelessness service providers do not receive fines on behalf of young people they are supporting.

7.2.3 Police Involvement

Sections 4.2.5 and Section 4.3.7 of the draft Policy highlight the possible involvement of ACT Policing in ensuring young people are 'given every opportunity and support to enable them to participate in the education or alternative option'. The Youth Coalition has significant concerns with this aspect of the draft Policy, in relation to how ACT Policing would be involved in supporting young people to participate in education. We are concerned that this would take on an enforcement role, and negatively impact the significant amount of work ACT Policing has been undertaking to develop positive relationships with young people. We seek further clarification on how this would be considered.

We urge the Department of Education and Training to engage in further discussion with the Youth Coalition and other stakeholders regarding the role of ACT Policing in young people's education participation requirements.

Recommendation 26

That the Department of Education and Training clarify the role of ACT Policing in supporting young people to participate in education.

7.3 Implementation of this Policy

The Youth Coalition seeks further information on how the Policy will be implemented and promoted. It is vital that education participation requirements are clearly articulated. For more information, please refer to Section 3.2 of this submission.

In addition to this, the Youth Coalition also encourages that the draft Policy includes a focus on the involvement of government and community-based youth services and workers in supporting young people to participate in the education requirement, prior to legal action being progressed.

8. Policy: Post Year 10 Alternatives

Section 8 of this submission responds to the draft policies *Post Year 10 Alternatives* (the draft Policies).

8.1 Definitions

There are some definitional concerns within this policy in relation to the definition of:

- Children and young people; and
- Parent.

For more information, please refer to Section 3.1 of this submission.

Within the context of this policy the Youth Coalition also seeks clarification of the difference between an “Information Notice” and “informal contact” as the definitions provided seem to indicate two separate data collection streams. We would also like to have a clearer understanding of the purpose behind these procedures.

Recommendation 27

That the Department of Education and Training clarify the difference between an ‘Information Notice’ and an ‘informal contact’.

8.2 Issues and Concerns

The Youth Coalition supports the inclusion of this draft Policy in the draft Policy Suite, to clearly articulate the options for post Year 10 alternatives for students in the ACT.

The Youth Coalition commends the Department for recognising that full time enrolment with an education provider, or home education, may not be the best option for a young person post Year 10. The opportunity to combine the options available will provide young people with more flexible pathways that will encourage a more personalised decision being made.

8.2.1 Support

To facilitate the best possible outcomes, employers may need to be supported to engage more young people in their businesses. We recommend that employers are supported to engage more young people in their businesses, in terms of awareness of the legislative changes and any extra responsibilities they may have, such as information notices or responsibilities to inform the Department as to the employment status of a young person.

Young people and their families’ access to relevant information and opportunities to engage with the process in a meaningful manner, are an important aspect of ensuring the success of the changes to education attainment and transitions. The Youth Coalition believes that young people and their families should be able to access information and support at existing ACT Government Shopfronts and Centrelink offices. For more information, see Section 3.3 for information relating to access.

8.2.2 Satisfying Full Time Requirements

Due to the increase in the school leaving age, Year 10 graduates may be negatively impacted by this policy. Young people of this age may have limited or no employment experience; and employers may be reluctant to hire young people with minimal

experience. Further to that, the nature of employment is likely to preclude young people from gaining contracts with fixed hours. This needs to be considered in the context of compliance with satisfying full time requirements.

The Youth Coalition recommends that a period of grace is applicable to young people who are actively pursuing employment in the first instance, in which young people may receive less than 25 hours of work per week. Factors that may be considered in granting a period of grace may include a young person's level of engagement with training, the nature of the employment sought, and existing supports available to the young person.

Recommendation 28

That the Department of Education and Training apply a period of grace to young people who are engaging in employment, but may not have a 25 hour a week contract initially.

8.2.3 Application Process

Confidentiality issues may arise when the Department is ascertaining whether the involvement of a parent is appropriate.

These concerns include, but are not limited to:

- Who can access potentially sensitive information;
- Location/method of storage; and,
- Potential ramifications of mandatory reporting requirements.

The Youth Coalition believes that the Department needs to provide further clarity and information as to what forms of evidence will be accepted to address 'parental consent', particularly in relation to young people being supported by an agency or presenting independently. For more information refer to Section 3.1.2.

The Youth Coalition would once again like to raise concerns regarding the practical access issues raised in Section 3.3.

8.2.4 Processing Time

The Youth Coalition of the ACT strongly urges the Department to reconsider the timeframe for processing applications for Approval Certificates.

A young person who has managed to secure work could be severely disadvantaged by a waiting period of 'at least 4 weeks'. We believe it is highly likely that an employer will be unwilling and/or unable to hold a position open for such an extended period.

The Department must consider possible procedures that could be introduced to speed up the process of approving applications, especially in situations where young people have already found employment. Additionally, the Department needs to provide information on what consequences will occur if a young person commences employment or training without an Approval Certificate.

Recommendation 29

That the Department of Education and Training reconsider the timeframe for processing applications to recognise that young people may need to take up employment when it is offered.

8.2.5 Approval and Consideration

The Youth Coalition of the ACT commends the Department for highlighting the best interests of the young person. It is important for this application process to take into consideration each young person's current circumstances.

A flexible and tailored approach to assessing the application will assist in achieving the best outcomes for the young person.

We seek to gain a better understanding of where this personal information will be collected from, and what privacy and confidentiality issues the Department may have identified.

We call on the Department to present how assessors will be supported to have the necessary skills and understanding of potentially complex issues to make an appropriate decisions and, if necessary, referrals. Please see Section 3.2 for more information.

8.2.6 Compliance and Revocation

The Youth Coalition believes that any communication between the Department and a young person (whether formal or informal) may identify issues experienced by the young person, providing an opportunity for positive engagement.

The Department should clarify the difference between 'informal contact' regarding compliance, and the formal 'information notice', as outlined in the draft Policy.

8.2.7 Withdrawn Applications

We seek clarification of the status of a young person whose application has been deemed to be withdrawn, and request that the below questions be considered:

- Will the Department consider the young person to be in breach?
- If an application is considered incomplete, and therefore deemed to have not been submitted, does the Department propose to renew the wait period from the time the resubmitted application is received? The current reading of the draft policy may suggest a potential turn around time of over 2 months.
- What support will be offered to review an "incomplete" application? Is there provision for a delegate of the Department to have direct contact with a young person to explain and address issues?

8.2.8 Change in Circumstances

The Youth Coalition believe that some issues may arise in using written correspondence as the primary means of contacting young people and their families or support people; and highlight the importance of using a range of communication methods appropriate to each individual situation. For more information, see Section 3.3 of this submission.

8.3 Implementation of this Policy

The Youth Coalition seeks further information on how the Policy will be implemented and promoted. It is vital that Post Year 10 alternatives are clearly articulated, with the aim of ensuring that young people have full access and understanding of the

alternative educational pathways available to them. For more information, please refer to Section 3.2 of this submission.

9. Policy: Education Options

Section 9 of this submission responds to the draft policy *Education Options* (the draft Policy).

9.1 Definitions

There are some definitional concerns within this policy in relation to the definition of:

- Children and young people; and
- Parent.

For more information, please refer to Section 3.1 of this submission.

Within the context of this draft Policy, the Youth Coalition has engaged with a range of youth support services that provide structured programs for young people. These providers have expressed a desire to have the approval of the Chief Executive conferred to structured programs they are currently running, or planning to run.

We seek clarification, on behalf of the youth sector, as to the process of applying for approval.

Recommendation 30

That the definition of an Education Provider is expanded to encapsulate youth support services that provide structured programs for young people.

9.2 Issues and Concerns

The Youth Coalition of the ACT welcomes the inclusion of education providers other than schools in this policy. We commend the Department for increasing the options available to young people as they plan to meet the requirements of the new compulsory education legislation.

9.2.1 Approval Certificates

Whilst the Youth Coalition is pleased that young people in active compliance with the educational requirements do not need to apply for Approval Certificates, we believe that it is important that all young people have access to the supports outlined in the Policy Suite. Furthermore, we have some concerns regarding young people enrolled in appropriate educational courses that run for one semester.

We seek to gain an understanding of the position for such an individual and whether the draft approval certificate procedures apply at the end date of the semester, and if so, whether the same conditions apply.

9.3 Implementation of this Policy

The Youth Coalition seeks further information on how the Policy will be implemented and promoted. It is vital that Education Options are clearly articulated, with the aim of ensuring that young people have full access and understanding of their individual educational pathway options. For more information, please refer to Section 3.2 of this submission.

10. Policy: Exemption Certificates

Section 10 of this submission responds to the draft policy *Exemption Certificates* (the draft Policy).

10.1 Definitions

There are some definitional concerns within this policy in relation to the definition of children and young people. For more information, please refer to Section 3.1 of this submission.

10.2 Issues and Concerns

The Youth Coalition generally supports the rationale of the Department to ensure all children and young people living in the ACT receive a quality education that meets their individual needs. The Youth Coalition acknowledges the draft Policy's recognition that there are occasions when it will not be appropriate to require a child or young person to be enrolled or registered, or to meet the full-time participation requirements of the ACT.

10.2.1 Application

The Youth Coalition acknowledges the need for an application to be completed by an adult with parental responsibility for the young person seeking exemption, however, we seek further clarification on what constitutes "reasons which indicate it is not appropriate to require parental consent."

Exemption

The Youth Coalition is pleased that the Department recognises that there may be situations where attendance is impacted for short periods of time. As the application process is somewhat time-consuming and the timeline for approval is variable, the Youth Coalition is concerned that young people who have followed the appropriate process and filed an Exemption Application will be breached for non-compliance if the approval period exceeds the two week grace period. The Youth Coalition believes it is important that measures are put in place to ensure that young people and their families are not penalised in such instances. It is essential that a solid framework and process is established for responding to exemption applications in a timely manner.

The way in which the exemption options are articulated is confusing and further information is required in relation to the difference between the two exemptions contained in the draft Policy. It is not clear if a young person who is exempt from being enrolled with an education provider or registered for home education needs to meet the full-time participation requirement through full-time employment or one of the other participation options.

The Youth Coalition is pleased that the draft Policy provides a timeframe for response to exemption applications. The Youth Coalition seeks further information on how the Department intends on ensuring that this timeframe is met and whether there are contingency plans in place should this not be the case.

Incomplete Applications

The Youth Coalition has concerns in relation to incomplete applications being deemed not submitted and whether this have an impact on an individual's compliance status and the possible punitive ramifications. The Youth Coalition believes that it is important for the policy to stipulate supports that may be available to assist families in appropriately completing the application. Furthermore, the Youth Coalition calls for the two-week grace period to be re-started in the event that an incomplete application is returned.

The Youth Coalition is satisfied that the Chief Executive has the capacity to seek further information where relevant. We seek clarification as to whether young people will be required to meet the full participation requirements until such a time that further information is provided and exemption is granted. The Youth Coalition is concerned that this may be unrealistic for some young people and feels that it is important for the Department to acknowledge this and have separate mechanisms in place to provide pre-approved exemption as an interim measure.

The Youth Coalition understands that there are specific administrative processes and timeframes that need to be adhered to and recommend that applicants are notified about the status of their application, in particular when that application has been deemed to be withdrawn due to failure to provide appropriate documentation.

Recommendation 31

That the Department of Education and Training clarify what constitutes 'reasons which indicate it is not appropriate to require parental consent.'

Recommendation 32

That the Department of Education and Training establish a solid framework and process for responding to exemption applications in a timely manner and include specific provisions to ensure accessibility for young people and their families, including:

- Re-starting the two-week grace period in the event that an incomplete application is returned;
- Pre-approved exemptions as an interim measure when further information is being sought;
- Notifying applicants of the status of their application.

10.2.2 Consideration

The Youth Coalition is pleased that the draft Policy considers the importance of applications being assessed individually on their merits, with the best interest of the child (young person) as a paramount consideration. The Youth Coalition has some concerns in relation to the rationale that the Chief Executive will rely on when undertaking these determinations. The Youth Coalition would like to see a comprehensive framework to support the process that provides the breakdown of how "best interest" principles will be applied.

Recommendation 33

That the Department of Education and Training develop a comprehensive framework to support the assessment of applications for Exemption Certificates that provides the breakdown of how 'best interest' principles will be applied.

10.2.3 Decision

The Youth Coalition understands that responsibility for compliance with the conditions and requirements of an Exemption Certificate lie with the parents and/or guardian of a young person. However, the Youth Coalition believes that it is imperative that support is available and offered to the parents and/or guardian of a young person to ensure that they are fully aware of and understand these requirements.

The Youth Coalition is pleased that detailed information will be provided in the case where an Exemption Certificate is not granted.

Recommendation 34

That the Department of Education and Training ensure that support is available and offered to the parents and/or guardians of a young person to ensure that they are fully aware of and understand requirements pertaining to Exemption Certificates.

10.2.4 Compliance and Revocation

The Youth Coalition has concerns in relation to how compliance will be monitored and maintained and what framework or control will be implemented in decision making around compliance.

10.2.5 Complaints and Appeals

The Youth Coalition is pleased that there is access to a complaints and appeals process. It is the recommendation of the Youth Coalition that information pertaining to this process, including appropriate forms, is included as part of the Exemption Certificate information pack and that this information is included in any correspondence once an Exemption Certificate Application has been lodged, regardless of whether it is approved or not.

10.3 Implementation of this Policy

The Youth Coalition seeks further information on how the Policy will be implemented and promoted. It is vital that the policies and procedures relating to Exemption Certificates are clearly articulated, with the aim of ensuring that the process is simple and streamlined. For more information, please refer to Section 3.2 of this submission.

Additionally, the Youth Coalition believes that there are some other areas of concern in relation to the Exemption Certificate Policy, which have not been covered in the body of the Policy and need to be considered prior to implementation. These include:

- Support for workers in services that have parental responsibility for a child / young person who is seeking exemption, in particular the increase in paper work required by these individuals;
- The accessibility of exemption applications being limited by access to a computer and the internet; and,
- The lack of consideration for the skill and knowledge level of individuals completing the forms.

The Youth Coalition recommends that, in the implementation of this draft Policy, the Department considers and implements strategies to counter the above mentioned concerns.

11. Conclusion

The Youth Coalition would like to congratulate the Department of Education and Training for provide stakeholders with the opportunity to comment on these important policies and procedures. This submission has highlighted a number of opportunities for improvement of the draft Policy Suite.

The Youth Coalition and the community youth sector believe it is essential that we continue to engage with the Department of Education and Training to work together in order to best support young people to engage in education, training and employment.

We look forward to participating in future discussions with the ACT Government regarding the education attainment and transitions.