



‘Dissolution by design’: Gonski school funding and school autonomy reform impacts on English as an additional language/ dialect programs in Australian schools

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Abstract

In 2011, the Australian Government embarked on an equity-badged, ‘needs-based’ school funding reform accompanied by national school autonomy reforms devolving decisions about resourcing, staffing and service design and delivery to school principals. In the second of three articles examining national policy impacts on English as an additional language/ dialect programs in Australian schools, this study examines the ‘enchanted’ policy designs of the Gonski funding and national school autonomy reforms that deregulated, devolved and ultimately dissipated tied-funded specialist EAL/D provision for English language learners. Analysis of data from ACTA’s 2016 *State of EAL/D Education in Australia* survey highlights direct ‘on the ground’ impacts of school autonomy policies in eroding the essential conditions for school EAL/D program provision and in intensifying school micro-political contestation around specialist expertise required for effective EAL/D program delivery. The article notes the national advocacy of the Australian Council of TESOL Associations (ACTA) in linking possible EAL/D policy solutions to emergent education policy agendas. The article provides a reassessment of the Gonski funding reforms and contributes to a growing critique of school autonomy policies in Australian school education.

Keywords: *Devolution; EAL/D policy; New Public Management; policy advocacy; policy design; policy streams; school autonomy.*

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Introduction

In 2011, the Australian Government embarked on an equity-badged, ‘needs-based’ school funding reform accompanied by national school autonomy reforms aimed at improving student performance and outcomes by devolving resourcing, staffing and service design and delivery decisions to school principals. These reforms reflected the longstanding national policy agenda of broadbanding tied funding of specialist provision for English language learners (Michell, 2025) but now turned to applying the New Public Management (NPM) reform agenda to service design and delivery in schools. The result was the effective sidelining and undermining of English as an Additional Language or Dialect (EAL/D) programs in schools.¹ This study traces the policy enchantment/displacement agendas, policy streams and designs that inevitably produced these impacts.

Literature review and methodology

As detailed in the preceding study (Michell, 2025), the policy enchantment/displacement perspective (Moore, 1991), the policy streams (Kingdon, 1984/1995) and New Public Management frameworks (e.g. Dunleavy & Hood, 1994; Fitzgerald & Rainnie, 2012) provide key analytical perspectives tracing the deregulatory agenda in the policy designs of the Gonski school funding and school autonomy reforms. This agenda is highlighted through a thematic analysis of key policy documents and texts (Braun & Clarke, 2013; Herzog, et al., 2017).

Analysis of the policy designs of the Gonski school funding and school autonomy reforms is informed by new policy design research (Howlett, 2014; Howlett & Mukherjee, 2018a; Peters & Fontaine, 2022; Siddiki, 2020), specifically, *policy design as content* as represented in the language of policy texts and interpreted by policy analysts (Siddiki & Curley, 2022). Analysis of policy content focuses on common policy design elements such as: ‘(i) goals or problems to be solved; (ii) policy targets, or those whose actions are affected through the implementation of policies; and (iii) tools through which target and target behaviour is compelled’ (ibid, p. 123). In this context, elements of the New Public Management (NPM) framework can be seen as both policy tools and policy designs. A major research gap in ascertaining how policy design features anticipate policy outcomes is addressed (Howlett & Mukherjee, 2018b; Siddiki & Curley, 2022). One application of this approach has been a focus on causal chain logics that represents the actual driver of policy effects in implementation, and ultimately the effectiveness of a policy design (Capano & Howlett, 2021).

Analysis and critique of Australian school autonomy reforms is informed by the growing literature on school autonomy policies and practices in state and territory jurisdictions. This literature encompasses research studies and government reports on the discursive features (Gobby, 2016; Keddie et al., 2022; Gobby et al., 2022; Smyth, 2011) and system implementation (Clinton et al., 2013; Education and Health Standing Committee, 2016; Gobby, 2013; Hamilton Associates, 2015; MacDonald et al., 2023) of the reforms, as well as impact

case studies in individual schools (Caldwell, 2016; Gobby et al., 2018; Keddie, 2017). There is a significant research gap, however, on the impacts of the reforms on teachers (e.g. teacher ‘flexploitation’, Gobby et al., 2024) and students in schools, and specifically, on the equity impacts on EAL/D teachers and learners throughout the education system.

To address this research gap, EAL/D teachers and educators were surveyed about their responses to the school autonomy reform in their state or territory. The survey included multiple choice, Likert scale responses and related open-ended questions, allowing both quantitative and qualitative data analysis of reform impacts in schools (Creswell, 2014; Fowler, 2013). EAL/D teacher comments were analysed according to deductive categories relating to key professional roles, responsibilities and relationships (Fink, 2024; Skjott Linneberg & Korsgaard, 2019), and further illuminated with reference to the literature on school micropolitics (e.g. Ball, 1987, 1994, 2012; Ball & Bowe, 1991; Blase & Björk, 2009; Flessa, 2009; Johnson, 2004; Kairiene, 2018; Lochmiller & Pawlicki, 2018; Malen, 1994).

Deregulating funding for English language learners: Gonski policy streams and designs

The period from 2011 to 2016 saw the convergence of problem, policy and political streams around Commonwealth school needs-based funding reform and its implementation as deregulated, flexible funding through devolved school-based resource management in school autonomy programs in all state and territory jurisdictions. Comprehensive national adoption of these reforms reflected the enchantments of additional school funding enhanced by NPM resource efficiencies of school-based, flexible resource management. As outlined in the previous study (Michell, 2025), this agenda had its antecedents in the COAG reform agenda of 2008-2012 on Commonwealth State relations and service provision focused on funding linked to achievement of outcomes/outputs rather than inputs; devolution of decision-making and service design to the frontline; and ‘competitive tension’ between the States and Territories and between service providers (Rimmer, 2010). The Gonski funding and school autonomy reform agendas complemented each other conceptually with the former focused on identifying and allocating deregulated resource inputs to schools and the latter focused on flexibly utilising those inputs in order to maximise educational outcomes.

Commonwealth schools funding reform: Problem and politics streams

The anomalies and inequities of Commonwealth schools funding had long been a key policy challenge due to entrenched interests of non-government school sectors and successive, piecemeal attempts at reform (Greenwell & Bonnor, 2022). Labor learned to its cost from its 2005 election loss that any schools’ funding policy that resulted in reduced funding for non-Government schools was electoral suicide. The Rudd Government consequently deferred this policy agenda until its second term of office (Kayrooz & Parker, 2010).

The needs-based funding reform finally presented by the *Review of Funding for Schooling Final Report* (Gonski et al., 2011) provided the substantive policy response to the problem of historically inequitable school funding across Government, Catholic and independent school sectors. Almost immediately, however, political considerations overwhelmed the policy, with Prime Minister Gillard's promise that no school (meaning non-government schools) would be worse off as a result of the reform (Greenwell & Bonnor, 2022; Reid, 2020). After a 17 month delay due to difficult Commonwealth-state negotiations following the report's public release, the Gonski funding reforms were finally legislated on 26 June 2013.²

Gonski 's needs-based equity funding: Policy design

The final 'Gonski' report (Gonski et al., 2011) proposed an equitable school funding system that would provide a level of base funding to all schools and additional funding for disadvantaged students with the stated aim of removing inequities and minimising identified student performance gaps. A proposed Resource Allocation Model (RAM), consisting of a per student base amount (the School Resource Standard – SRS) and six additional 'disadvantage' loadings, included a low English language proficiency loading for students with limited English³. Students attracting this loading were identified as having a language background other than English (LBOTE) and at least one parent who only completed school education to Year 9 (or equivalent) or less. The design of this 'disadvantaged LBOTE' loading, however, was an indicator of students' low socio-economic status rather than a real measure of their English language proficiency. The loading was arbitrarily set at 10 per cent of the SRS funding amount, up to an unspecified capped funding amount (Senate Select Committee on School Funding, 2014).

On the face of it, the low English language proficiency loading appeared to preserve a dedicated, equity provision for EAL/D learners. That this was not the case is made clear by the flexible, discretionary, and interim nature of the equity funding and the rejection of targeted programs stated in the Gonski report:

Recommendation 6

In contributing towards the additional costs of educating disadvantaged students, *governments should move away from funding targeted programs* and focus on ensuring that the states and territories and the non-government sector are publicly accountable for the educational outcomes achieved by students from all sources of funding. (Gonski et al, 2011, p. 137, author italics.)

Targeted funding programs

The schooling resource standard represents a new approach to funding schooling and the costs of redressing educational disadvantage. ... *This would replace the approach, which the Australian Government has taken since the 1970s, of seeking to influence the direction of schooling or the achievement of particular*

outcomes through additional program funds for specific activities or groups of students....

The panel believes these types of specific purpose funding are incompatible with the new funding model framed by the schooling resource standard and should be phased out, with the funds planned to be allocated through them rolled into the base of funding available for the new model. (Ibid. p. 182, author italics.)

From the outset, then, the new Commonwealth needs-based equity funding was a *notional* provision designed for maximum flexible use by systems and schools with marginal connection to student groups and their actual learning needs. The Commonwealth Government response to a Senate Estimate Question on Notice makes this disconnection clear:

As with all Commonwealth recurrent funding for schools, the total funding (base and loadings) are provided as a lump sum to school authorities, which can then distribute the funding to schools according to their own needs-based arrangements. While Government funding is calculated with reference to students enrolled at a school, schools and school systems are not required to spend specific amounts of funding on individual students or designated student groups. This includes funding provided under each of the loadings for disadvantage.⁴

Equity loadings were thus designed as resource *factors* that appeared to address student disadvantage while effectively weakening a program focus on equity target groups. This inadequacy was not fully appreciated by the Gonski constituency of teacher unions, parents and the general public for whom the prospect of increased overall funding was the focus of their enduring political support in the decade following the report's release.

As evidenced by these policy texts, minimal accountability and transparency for Commonwealth needs-based funding was built into the policy design. With accountability reporting limited to a financial acquittal process relating to the distribution of base and loading amounts in a block funding report, there was no possibility of national reporting on how low English proficiency funding allocations were used by schools and States/Territory systems to support the English language learning of their EAL/D students. The Commonwealth Government response to the Senate Estimate Question on Notice highlights the minimal accountability attached to its school funding:

Accountability for Commonwealth funding is limited to a financial acquittal process relating to the distribution of base and loading amounts in a block funding report. The Commonwealth admits it does not have visibility of the state or territories' own expenditure on specialist English as an additional language or dialect (EAL/D) services. States and territories are responsible for the distribution of school funding, both Commonwealth and state funding, in accordance with their own needs-based arrangements.⁵

This ‘hands off’ approach by the Commonwealth Government to state and territory government accountability for Gonski funding was replicated, in turn, by state and territory government *laissez-faire* accountability for schools’ use of allocated funding under their devolved school-based management/school autonomy programs. This national funding cascade instituted non-transparent, minimal public accountability for funding at both Commonwealth-to-state and state-to-school levels. With devolved state and territory government responsibility for provision of EAL/D services in schools, flexible funding for EAL/D learners was no longer identifiable, traceable or reportable.

Gonski’s low English proficiency loading: An ‘equity façade’

A further critique of the equity design of the Gonski funding reform centres on the inadequate *quantum* of the low English proficiency loading able to provide meaningful funding support for EAL/D learners. The resulting Commonwealth low-English proficiency loading amounted to a tiny percentage (0.2 per cent in 2019) of total school funding in the Government sector.⁶ Analysis of low proficiency loadings in 2019 found average per student allocations of \$212 for Government schools, \$893 for Catholic schools, and approximately \$987 for Independent schools,⁷ indicating that the uneven, system variations in school sector distributions were by no means ‘sector blind’ (Bonnor & Shepherd, 2016). The per student loading amount for Government schools was so inadequate that it would not even fund a single day’s English language instruction at then teacher salary rates. When compared to previous Commonwealth ESL New Arrivals per capita funding levels (\$5,039 in 2005) and modelling by the MCEETYA Schools Resourcing Taskforce (2006),⁸ the loading actually constituted a major reduction in Commonwealth funding for English language provision.

The gross inadequacy of the low English proficiency loading can be partly attributed to the ‘disadvantaged LBOTE’ algorithm used to identify students with English language proficiency needs. The formula was found to be an inaccurate proxy indicator that does not capture real English language proficiency needs of the EAL/D learner cohort and its use failed to ensure effective targeting of resources as it produced gross misalignments between students captured by the measure and students with actual English language proficiency needs (CESE, 2013).⁹

The Commonwealth justified this token amount of the low English proficiency loading with reference to jurisdictions’ ability to flexibly pool Commonwealth and State and Territory funding:

As with all Commonwealth recurrent funding for schools, the total funding (base and loadings) are provided as a lump sum to school authorities, which can then distribute the funding to schools according to their own needs-based arrangements. Schools and school systems are expected to pool their funding from all sources (i.e. Australian Government, state and territory and private) and prioritise spending to meet the educational needs of all their students,

recognising that schools and school systems are best placed to understand the individual needs of their students.

The Commonwealth expects schools and school systems to consider their funding from all sources (i.e. Australian Government, state and territory and private) and prioritise their spending to meet the educational needs of all their students, including for students with low English language proficiency.¹⁰

This reliance on pooled resources amounts to an admission that the low English proficiency loading was inadequate for the intended purpose of providing English language support to EAL/D learners. The Gonski funding reform thus succeeded in operationalising reduced, untied funding for English language learners and effectively shifting costs for English language provision to state and territory governments. With maximum divert-ability of its unequal, marginal funding, the Gonski disadvantaged loading for low English language proficiency can only be considered an equity façade.

National school autonomy reform: NPM policy design

In conjunction with the Gonski funding reform, both Labor and Liberal Coalition Governments actively promoted school autonomy and devolved management policies as a key education governance and service reform they believed would drive improved student educational performance and increased school productivity. The specious assumptions on which this reform rested (e.g. Cobbold, 2014; McDougall & Goldenberg, 2007) suggests that this was a pre-existing NPM resource constraint policy solution in search of a policy problem. Politically, the reform effected a systemic shift of responsibility for educational equity and outcomes away from governments towards ‘responsibilised’ schools and principals, laying the ground for subsequent, possible blame-shifting (Peters, 2017; Torrance, 2018).

With its pseudo-educational goal ‘to meet the unique needs of students at each school and drive improved student performance’ (DEEWR website, 2012), the national school autonomy agenda was advanced through two key policy mechanisms: a) the Gillard Labor Government’s nationally-funded seeding project, *Empowering Local Schools*, and b) jurisdictions’ school autonomy policies, which replicated the national school autonomy design elements of ‘one-line school budgets, and management of the school staffing profile, including support staff, to determine the right mix of staff, recruitment and staff selection’ (ibid.). These two design elements are core in the description of school-devolved responsibilities in the Commonwealth program:

The Gillard Labor Government will drive improved student performance and outcomes by giving principals, parents and each school community greater power to determine how their local school is run – including greater responsibility for school budgets, determining the right mixture of staff, and

setting local priorities. A national roll-out will commence with 1,000 schools over 2012 and 2013. (ibid.)

The Commonwealth Government's school autonomy program seeded multiple pilot programs in state and territory jurisdictions, boosted by a plethora of policy direction and consultancy and pilot reports (e.g. ARTD Consultants, 2011; NSW DEC, 2012b; Clinton et al., 2013; Hamilton Associates, 2015). While state and territory school autonomy policies varied somewhat in their degree of management autonomy, links to the education system (Gobby, 2016) and policy enactments in different locations (Gobby et al., 2018; Gobby et al., 2022), all operationalised core school-based management designs of global budgeting and flexible staffing advocated by the national program (Keddie et al., 2022). Implementation roll-out in states and territories was staged with financial incentives for early 'opt-in' schools followed by mandatory participation by all schools in the system. **Table 1** provides an overview of this national roll-out of school autonomy programs in state and territory education systems.

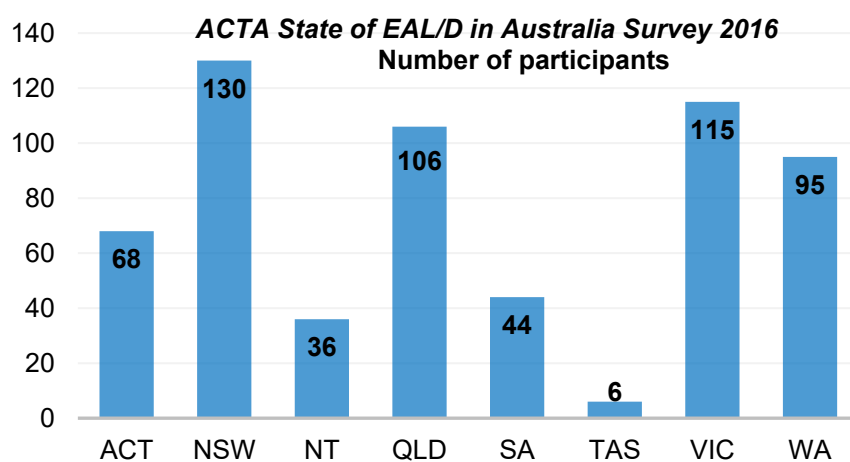
Table 1. Roll-out of school autonomy reforms in state and territory jurisdictions.

JURISDICTION	SCHOOL AUTONOMY POLICY	IMPLEMENTATION
South Australia	Partnerships 21	Introduced in 2000, with one-line budgets in 2011
ACT	ACT school autonomy policy	The policy was developed and published in 2009
Western Australia	Independent Public Schools (IPS)	Introduced in 2009, five intakes of Independent Public Schools constituting 57% of all public schools and 70% of the students and staff in 2015.
Victoria	Towards Victoria as a Learning Community	Introduced in 2012, rebadging of previous self-governing schools' policy, "Schools of the Future", introduced by the Kennett Government in 1993.
New South Wales	Local Schools Local Decisions	Launched in 2012 following school-based management pilots (2011, 2012), finally replaced by School Success model in 2020
Queensland	Independent Public Schools (IPS)	Commenced in 2013, expanded to 120 schools in 2015, then to 250 schools in 2017.
Northern Territory	Independent Public Schools (IPS)	Introduced in 2015 as part of a school improvement initiative, increasing school autonomy.
Tasmania	Tasmania school autonomy policy	The policy was implemented in 2016, involving a transition period, commencing on July 10, 2017, and continuing through 2021.

Given its NPM policy design of devolved service management and delivery, the displacement impacts of school autonomy reforms on school EAL/D programs can be readily foreseen. The flexible resource management of the school's 'one line' budget greatly increases principals' discretion over uses of the allocation, creates competing program priorities, and encourages resource trade-offs or diversion of previously dedicated EAL/D funding to other priorities. Expanded principal control over the school's staffing profile promotes flexible funding and staffing of EAL/D programs; casualisation and de-professionalisation of EAL/D teachers, and residualisation or cessation of the school's EAL/D program. Far from empowering schools and their communities, these policies require schools to make contingent resourcing decisions that impair the quality and continuity of specialist provision for their EAL/D student cohort. The results of the national EAL/D survey outlined in the next section confirms and illustrates these impacts.

Policy impacts: Displacement and dissolution of EAL/D programs in schools

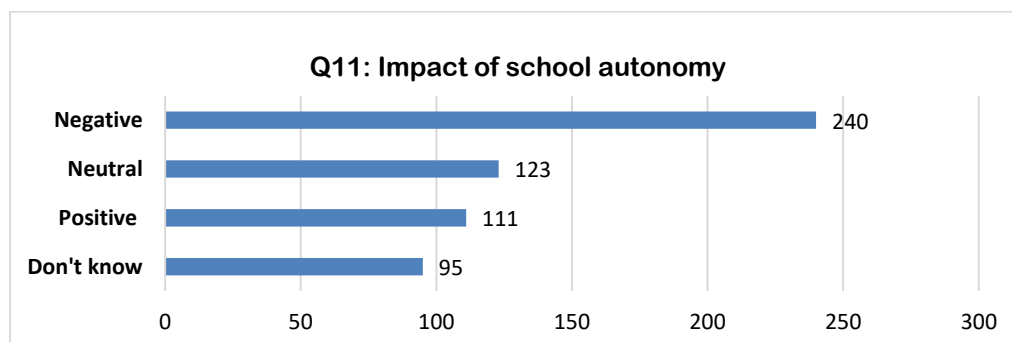
From February to March 2016, the Australian Council of TESOL Associations (ACTA) conducted a 'State of EAL/D Education in Australia' survey through its state and territory member associations to ascertain the current health of EAL/D programs in Australia. As shown below, the survey received a total of some 600 responses from educators in all Australian state and territory education systems. 57 per cent of respondents were from early childhood and primary schools and 43 per cent from secondary schools. Approximately 55 per cent of respondents were EAL/D teachers; 20 per cent class teachers; 15 per cent school leaders, with the remainder being EAL/D consultants, bilingual support officers, and teacher educators.



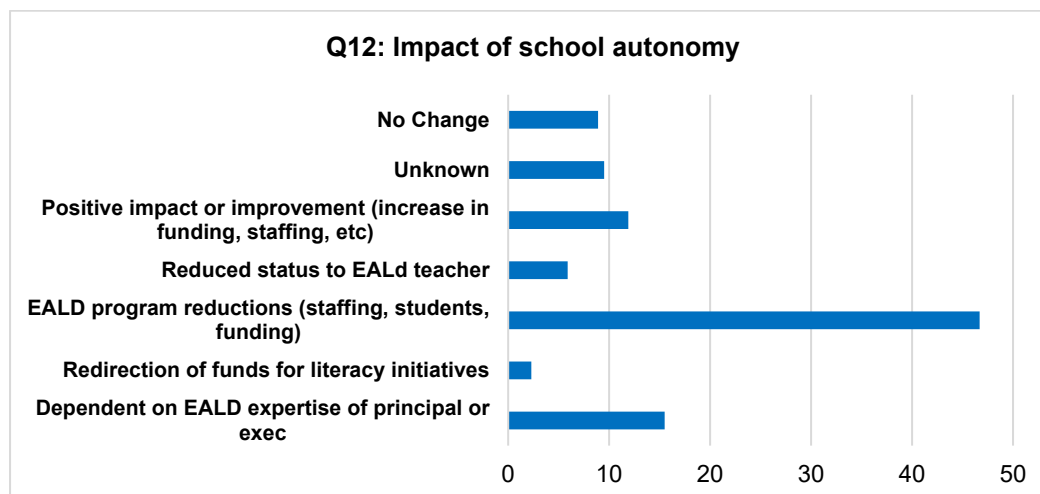
The survey contained 14 open-ended questions inviting further explanatory comments. These comments, which accompanied some 45 per cent of all responses, were analysed, classified and are reported below. The survey responses provide a window on the widespread deterioration of school EAL/D programs caused by state and territory governments' school autonomy policies during the early stages of implementation.

Responses to Question 11 below show that, even at this early stage, some 240 teachers, or 42 percent of respondents reported negative impacts of school autonomy on support for EAL/D learners.

Question 11: *Currently EAL/D funding and support is being decentralised and managed at the school level. Overall, what do you think has been the impact of school autonomy for your EAL/D cohort?*

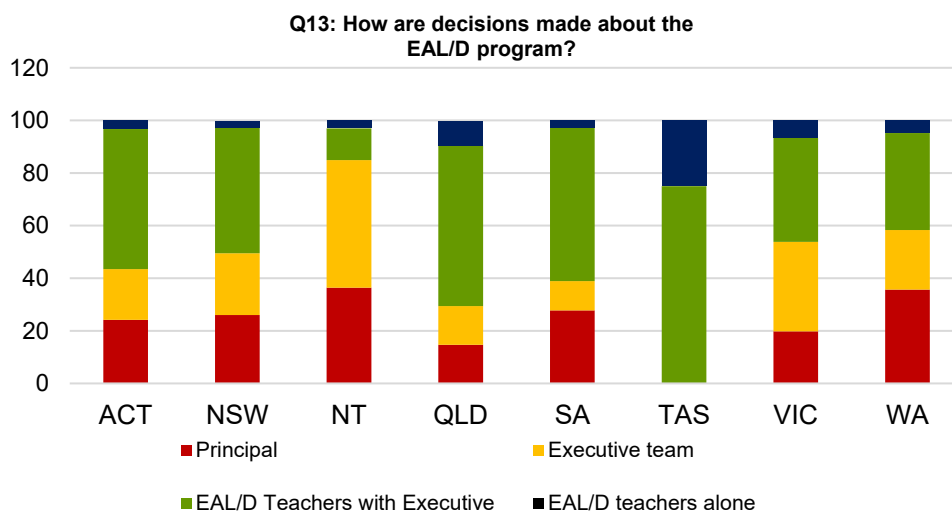


These negative impacts are elaborated in responses to Question 12 which show that school autonomy programs were eroding EAL/D program funding, staffing and student support in 48 per cent of cases. These responses provided the main topic of the elaborated explanatory comments in the analysis that follows.



Responses to Question 13 below draw attention to the precariousness of school EAL/D programs in the face of increased school-based decision-making under school autonomy policies. Not being designated as a key learning area with its own curriculum structure and regulations, EAL/D program provision and delivery is dependent on informed negotiation with the principal and/or executive in order to be incorporated in the school timetable as a targeted access and equity program. As shown in the responses below, decisions about the great majority of EAL/D programs are made by EAL/D teachers *in consultation with* the school principal and/or executive. Planning, resourcing and implementation of EAL/D programs in schools therefore crucially rely on the understanding and goodwill of the school principal and executive (cf. Lochmiller & Pawlicki, 2018). Where this is lacking, the school's EAL/D program suffers greatly.

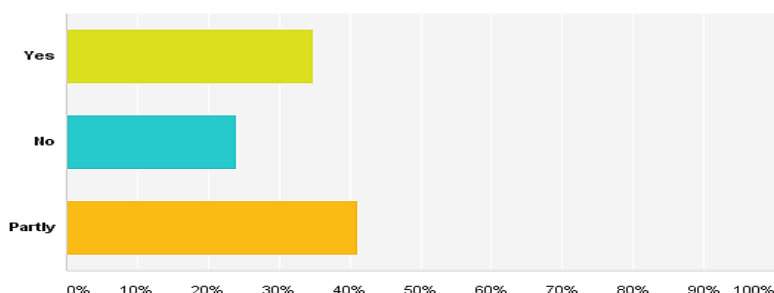
ACTA State of EAL/D in Australia Survey 2016



Responses to Question 14 highlight the ambivalence and initial concern of EAL/D teachers about the adequacy of school leaders' understanding of EAL/D education to make appropriate decisions about the program. These concerns are elaborated in the comment analysis that follows.

Q14 Does your school leadership team have the requisite understanding of EAL/D matters to administer funds/make decisions on behalf of these students?

Answered: 421 Skipped: 91



The EAL/D teacher comments presented in **Appendices A** and **B** are a representative sample of all survey comments. Nearly all comments were found to be critical of school autonomy policies, due to teachers' personal experience of its negative impact on their EAL/D teaching role and EAL/D provision in the school. The teacher response below encapsulates the range of teachers' concerns about the erosion occurring across all aspects of the EAL/D program:

EALD programs/provision/services have been seriously eroded over the past several years in our state. Programs have been closed, funding has been reduced, teacher/leader time has been cut, funds allocated for EALD have been used for other school purposes, no accountability for use of funds exists, mainstream teacher knowledge of EALD learners' language/literacy needs has diminished with lack of PL provision.

Ball's (1987, 1994, 2012) policy actor roles and policy enactments shed light on EAL/D teachers' comments showing how they were positioned by school autonomy reforms as both *passive receivers* and *critics* of the reform with little ability or agency to counter its effects (see also Ball et al., 2011; Gavin et al, 2022). The few positive comments about EAL/D provision in a particular school are set against awareness of EAL/D program erosion in neighbouring schools or are qualified by uncertainty about the fate of the school's EAL/D program following future principal and staff changes. Taken together, these comments highlight how school autonomy policies have greatly expanded the decision-making scope and powers of principals at the expense of EAL/D teachers' advocacy and agency on behalf of their students.

Teacher comments are further analysed and classified from two perspectives according to a) essential conditions for EAL/D program provision (**Appendix A**), and b) areas of contestation

around the professional knowledge required for effective EAL/D program planning and delivery (**Appendix B**). These perspectives reflect ‘on the ground’ impacts of NPM devolved and deregulated service delivery principles and internal school resource competition inherent in school autonomy reform.

Teacher comments relating to the *erosion of essential conditions for EAL/D program provision* encompass the areas of:

- System EAL/D policy and support;
- Identification of EAL/D learner needs;
- EAL/D resourcing in schools;
- EAL/D staffing and provision;
- EAL/D program support to students; and
- Accountability for EAL/D program delivery.

This analysis highlights the organisational mechanisms and causal pathways of EAL/D program displacement and erosion resulting from school autonomy policies.¹¹ In relation to 1, comments describe the loss of *system EAL/D policy and support* through restructuring, downsizing or abolition of administrative units and personnel directly responsible for EAL/D program management and guidance. Crucially, this included the loss of system EAL/D pre-service training and in-service professional development. In relation to 2, comments highlight the breakdown in the *identification of EAL/D learner needs* in schools due to sidelining of EAL/D teacher expertise. In relation to 3, *EAL/D resourcing in schools*, comments detail the diversion of low English proficiency needs-based funding to other school priorities due to flexible resource management practices promoted by school autonomy policies. In relation to 4, *EAL/D staffing and provision*, comments highlight the wide-spread deterioration of the targeted program due to flexible staffing practices that undermine stable employment of EAL/D trained teachers. In relation to 5, comments highlight the deterioration of *EAL/D program support to students* as a result of 1, 2, 3 and 4 above. Finally, in relation to 6, comments highlight the lack of system transparency and *accountability for EAL/D program delivery*.

Comments can also be analysed according to *areas of contestation* about the professional knowledge needed for effective EAL/D program planning and delivery. Comments are grouped in relation to professional conflicts around:

- Specialist knowledge, expertise and values;
- School resource decision-making; and
- EAL/D program organisation and pedagogy.

These areas of professional conflict between EAL/D teachers and school executives echo the professional disconnection and division found between teachers and management promoted by school autonomy (Gobbie et al., 2022; Keddie, 2017; McGrath-Champ et al., 2018). This analysis also recalls the wider research literature on the *micropolitics* of schools (Ball, 1987;

Kairiene, 2018), where “overt and covert processes through which individuals and groups in an organisation’s immediate environment acquire and exercise power to promote and protect their interests” (Malen, 1994p. 147). Teachers’ survey comments about deteriorating EAL/D program provision and professional contestation reflect the key findings of school micropolitics research; namely, school micropolitics is exacerbated by school change and reform (Ball & Bowe, 1991; Blase & Björk, 2009); is focused on policy and management issues (Hoyle, 1999); and is implicated in everyday school operations such as resource allocation (Lochmiller & Pawlicki, 2018), instruction and instructional supervision (Blase & Blase, 2002), literacy policy (Innes, 2022), teacher class allocations (Grissom et al, 2015) and team leadership (Flessa, 2009; Johnson, 2004).

Overall, the survey comments offer a rare expression of EAL/D teacher voices and concerns about the impacts school autonomy reforms, and provide clear evidence of the systemic displacement and dissolution of all aspects of EAL/D provision resulting from the two core design elements of the autonomy reform:

- One-line school budgets allowing flexible resource management across multiple school programs and competing priorities;
- School-based management of school staffing, determining the mix, recruitment and selection of staff.

As evident from the comments, school-based decision-making is essentially principal-based decision-making which encourages diversion of previously earmarked funding away from the EAL/D learner target group to other priorities. School-based staffing decisions lead to EAL/D teacher redeployment and casualisation, employment of untrained EAL/D teachers and an overall loss of specialist EAL/D teaching expertise in schools. Changes to the school funding model toward flexible broadbanded funding are not accompanied by commensurate accountability mechanisms and result in a lack of transparency in both system-to-school and internal school funding allocations for the EAL/D learner target group¹² and a lack of public accountability reporting for how these funds are being used.¹³

National EAL/D professional advocacy

The longstanding national EAL/D policy vacuum and systemic erosion of school EAL/D programs in the wake of the Gonski school funding and school autonomy reforms called for a national professional policy response. Throughout this period and beyond, ACTA undertook policy advocacy in two ways: a) submissions to Commonwealth Government inquiries and proposals (see the policy timeline in Michell, 2025) and b) direct representation with key education agencies proposing strategic EAL/D policy solutions to current national policy agendas. The later approach aimed to counter EAL/D omissions in national policy by developing strategic EAL/D input to key policy agendas and documents. While ACTA

submissions have met with little success, the examples of direct agency representation described below have been more productive.

In the wake of Rudd's 'education revolution', ACTA saw the proposed National Curriculum as an opportunity to re-establish a national approach to EAL/D assessment and teaching in Australian schools.¹⁴ As result of representations to the newly formed Australian Curriculum and Assessment Authority (ACARA) in 2009, ACTA led development of the *ACARA EAL/D Learning Progression* (ACARA, 2015) published in 2011.¹⁵ This year, ACARA invited ACTA to consult on minor updates to the senior secondary EAL curriculum and on the publication of a downloadable version of the EAL/D Learning Progression in a teacher-friendly format.

Established in 2010 as part of Rudd's education reforms, the Australian Institute for Teaching and School Leadership (AITSL) was a key national agency through which national recognition and accreditation of specialist EAL/D teaching could be promulgated. To address the EAL/D omission in AITSL's professional teaching standards, ACTA, in collaboration with AITSL developed the *EAL/D Elaborations of the Australian Professional Standards for Teachers* (2015) as a supplementary standards framework.¹⁶

In response to the national EAL/D policy vacuum and widespread deterioration of school EAL/D programs under school autonomy reforms, ACTA issued a *National Roadmap for EAL/D education in schools* (ACTA, 2022) as a comprehensive, national strategy for repairing and reforming EAL/D education, aligned with the National Schools Reform agenda and agreements. Outlining targeted solutions to twelve key national EAL/D policy problems, the *Roadmap* remains an essential blueprint for the national rebuilding of effective EAL/D programs in Australian schools.

Following the *Improving Outcomes for All* Report (2023), which supported making EAL/D a priority cohort for data collection and measurement under the National Schools Reform Agreement (NSRA), ACTA met with the NSRA Review Taskforce advocating inclusion of the EAL/D student cohort in national reporting of progress and outcomes as part of a revised Measurement Framework for Schooling in Australia. The outcome of this advocacy remains to be seen but will crucially determine the national identification and visibility of the EAL/D student cohort in Australia and therefore the national role and status of EAL/D education over the next decade.

Conclusion

This account highlights how the systemic erosion of EAL/D programs in schools occurred in two stages of national policy development and implementation. Firstly, reflecting longstanding commitment to a national broadbanding agenda, the design of Gonski funding reforms laid the ground for the deregulation and flexible use of previously earmarked funding for EAL/D learners in schools. Secondly, the NPM design of national school autonomy reforms realised

this intent ‘on the ground’ through the widespread displacement and dissolution of school EAL/D programs. In this way, the systemic damage to EAL/D programs inflicted by school autonomy reforms constitutes something of a policy *coup de grace* in the long history of the devaluing and displacement of this targeted program.

The study highlights the value of policy design research in critically analysing the key design features of national education ‘reform’ documents and their effects. A key insight arising from this study is that policy risks and results are inherent in the elements of policy design and therefore can and should be foreseen in any policy formulation and development. Allied to this, is the need for policy researchers to extend critical data sources by utilising a range of publicly available policy documents such as government reports, audits and inquiries, and responses to parliamentary questions, and supplementing these sources with other necessary information, such as survey data.

The study also draws attention to the need for education policy analyses to go beyond generic discourse-based neoliberal and social justice critiques and individual school case studies of school autonomy effects and investigate the systemic impacts of reform policies on equity programs, teachers and students across the education system. This study of the fate and fortunes of EAL/D programs in schools highlights the limits of such discursive and case study approaches, necessitates a reassessment of the equity intentions and outcomes of Australia’s national funding and school autonomy reforms, and invites further critical policy research in this area.

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Glossary

ACARA - Australian Curriculum and Assessment Reporting Authority

ACTA - Australian Council of TESOL Associations

AITSL - Australian Institute for Teaching and School Leadership

COAG - Council of Australian Governments

CURASS - Curriculum and Assessment Committee (of the Australian Education Council)

DEEWR - Department of Education, Employment and Workplace Relations

EAL/D or EALD - English as an Additional Language or Dialect

ESL - English as a Second Language

IPS - Independent Public Schools

LBOTE - Language Backgrounds Other Than English

NAPLAN - National Assessment Program – Literacy and Numeracy

NPM - New Public Management

NSRA - National Schools Reform Agreement

RAM - Resource Allocation Model

SRS – School Resource Standard

TESOL - Teaching English to Speakers of Other Languages

Appendix A: ACTA state of EAL/D education in Australia survey

Teacher comments – Erosion of conditions for EAL/D program provision

1. System EAL/D policy and support

All aspects of ELD services have been cut and scaled back at both a school & system level over the past 5 years!!! Significant erosion of services leaving EAL/D students at all levels of schooling at much greater risk than ever before.

There is no EALD team in our state really supporting schools as per the past. There are no consultants in district office or ESL visiting teacher. There is no real voice in the Department anymore for EALD.

Eradication of the Multicultural consultancy has dramatically reduced the TESOL professional learning for all teachers particularly in policy and pedagogy support and current research.

Our EAL support team in central office is now included in literacy. There is nobody to call or get support from except peer teachers whose numbers are decreasing.

Demise of consultancy has meant fewer opportunities for professional learning locally and system wide.

TESOL professional development has significantly decreased and teachers are no longer required to have TESOL qualifications to teach in TESOL contexts.

There is an increasing isolation felt by EAL/D teachers, especially in other schools around us. We live in a vacuum now.

Since we no longer have regional consultants, we do what we can for ourselves.

2. Identification of EAL/D learner needs

Across the system most schools do not have the understanding of EAL/D matters to make informed decisions about catering for EAL/D students' learning needs.

The lack of understanding in this school begins at enrolment and carries onto course placement. Many of the people in decision-making positions do not have the prerequisite knowledge of the needs of EAL/D students.

Leadership have limited knowledge of EAL/D teaching and learning and how this impacts on the EAL/D students accessing the Australian Curriculum.

Schools tend to give little credibility to the needs of EALD students and lump the students with low ability students instead.

Lack of knowledge of how the new funding model works impacts on EAL/D service provision and this led to many schools not retaining the services of the EAL/D specialist

Schools are making decisions on funding without appropriate knowledge about the needs of students.

Funding is being used in many ways that don't directly support students which reflects a lack of understanding of EAL/D matters.

3. EAL/D resourcing in schools

All funding for our EAL/D students have been put into the school general budget. We don't have a separate budget for EAL/D students. Our Principal makes all the decision regarding what our EAL/D students need and who our EAL/D teachers can teach.

With the advent of IPS schools, one-line budgets and online gleaning of data, no one seems to know how much money has been allocated and in many schools there is no longer an EAL teacher to advise on the best way to spend the funds to best support the learning of the EAL students.

Several changeovers of the principal position have affected the allocation of funds to EAL/D students. So, everything depends on what the principal values.

All programs across the school compete with ELD for funds. Usually, ELD is not a significant priority.

EAL/D funding is being pooled with Special Education funding so Special Education teachers are asked to take on the role – with no training.

There's a tendency in schools to employ staff who suit their timetabling arrangements rather than staff who have knowledge and experience in EAL/D support.

The program has essentially been de-valued. Programs are easily collapsed and EALD staff is used to cover staff training and programming!

4. EAL/D staffing and provision

Last year English language proficiency funding was used on non-EAL students EAL/D provision is reducing with regularity since bottom line funding.

EAL/D provision is reducing with regularity since bottom line funding.

Every aspect of ELD provision in our state has been negatively impacted by recent funding models and general lack of commitment at both school/system levels and resulted in a significant deterioration of ELD service provision. ELD is in the worst condition I have ever experienced in my teaching career.

Funds have not been used for EAL/D students and have been allocated for other purposes in the school to the detriment of EAL/D learners and teachers.

Dedicated classroom teacher position (part time) for EAL/D has been absorbed into general school staffing points.

EAL/D teaching specialist positions are being reduced to part-time or replaced by generalist teachers.

Over the past two years we have seen the demise of TESOL support with specialist teacher being reduced to part-time and expected to take release lessons and whole classes.

Teachers are working additional hours and putting in enormous efforts to support the EALD students yet often find themselves unemployed at the end of the school year or made to teach mainstream classes.

The role of the EAL/D teacher is often used to cover other classes when the school deem it necessary.

EAL/D funding is being pooled with Special Education funding so Special Education teachers are asked to take on the role – with no training.

No prerequisite training for any staff. No EALD support in classes. Class sizes above 27 students.

5. EAL/D program support to students

Since schools have become autonomous, any way to save money is looked for and very often it is at the expense of the EAL/D students.

At my school the principal cut the EALD specialist teacher, despite getting funding for it. The funds are not being used on EALD students and no program exists now.

Funds have not been used for EAL/D students and have been allocated for other purposes in the school to the detriment of EAL/D learners and teachers.

Funding cuts are impacting greatly on EAL/D support and therefore students' ability to access all areas of the curriculum.

In a school with over 50% EALD students with literacy issues there is no formal support.

EAL programs have vanished and dedicated EAL teacher support no longer offered to EAL students.

Defunding and downsizing mean less EAL/D support, especially in Aboriginal EAL/D.

Classroom teachers are being presented with students with no English at all and expected to deal with it. The children get less specialist time.

Students in junior school do not have access to EALD trained teachers and sit quietly in the classroom. Their level of language has been impaired by decentralised school funding and ESES system.

The school does not promote and value EAL/D and believe that EAL/D students "catch up" with mainstream.

Students are left to "get on with it" and learn without adequate resources.

Needs are not being met and students are failing.

The whole of EALD is disintegrating. It appears a return to "assimilation" is now the preferred model.

The ESL students are becoming or have become invisible; poor results are easily justified because "well they are ESL ".... back to the 1960's.

6. Accountability for EAL/D program delivery

Now that most schools in our state are Independent Public Schools, the administration team can allocate/distribute their one-line budget funds however they choose. There is no accountability anymore.

With the advent of IPS schools, one-line budgets and online gleaning of data, no one seems to know how much money has been allocated

I believe that a few years ago the overall picture was clearer – it was clear to the EAL teacher, who scrutinised the census document and who was entrusted with the role of providing support for the EAL students exactly how many students were receiving funding and recommended how that money should be spent to support the students.

Very limited accountability at the department level to ensure allocated funds are being used for the intended purpose.

No adequate checks and balances to schools as to where funding goes – seems to be open to interpretation.

There is no requirement to address the EAL/D cohort for accountability purposes...no school reviews processes which look specifically at EALD groups.

Principal vague about funding amount and does not use all on EAL students.

Where cuts are to be made, they seem to be first made with EAL programs or affecting EAL students – because there is far less community outcry when this happens.

There isn't an appreciation that we have close to 80% EAL. I don't know what percentage of funds are going to the program and where other money is being allocated elsewhere, which is what schools often do.

There needs to be greater accountability. If the school receives funding from the government for EAL/D students through the school census, then they need to show evidence that these funds have been used to enhance the learning of those students.

Appendix B: ACTA state of EAL/D education in Australia survey

EAL/D teacher comments – Areas of contestation

1. Knowledge, expertise and values

The funding is controlled by a principal who doesn't understand the value of EALD teaching everything depends on what the principal values.

Some Principals have very little understanding of EALD and second language acquisition.

When a regional leader, principal and school leadership are unaware of the needs of EAL/D, the effect is devastating.

School leadership have very limited understanding of curricular and language learning needs of students. No real understanding of how seriously at risk many ELD students are of achieving secondary graduation impacting schooling outcomes in a very negative manner.

The new philosophy is specialists are out and teachers can play in any position required in the school. Execs in primary are given EALD and most have no passion for the role. People with no understanding of EAL/D are making the decisions and devaluing it.

Overall schools are less likely to employ teachers with specialist knowledge about EAL learning and teaching and are more likely to use cheaper ESO time to support EAL students.

There is a loss of expertise accumulated over decades.

The system does not care about EAL/D. It is all about money and saving money.

The system doesn't care and doesn't listen to the people who do care.

2. School resource decision-making

Now that most schools in our state are Independent Public Schools, the administration team can allocate/distribute their one-line budget funds however they choose.

Schools in our state have one-line budgets – funds for EAL/D programs are not separated or targeted – the schools decide how much and whether to use the funds for EAL/D positions/programs.

Since schools have become autonomous, any way to save money is looked for and very often it is at the expense of the EAL/D students.

Leadership team has decided not use EAL/D position to support EAL/D students but to instead use position to give teachers their non-contact mandated planning time.

Total control by the Principal – funds, resources and staff and support diverted away from EALD students without consultation or ability to influence decision making.

Principals are choosing where to channel the funds and often funds are not directed to cater to the needs of EALD learners.

Schools are at the whim of the knowledge of Principals who have no knowledge of EAL teaching. Lack of accountability in how funding is used.

People with no understanding of EAL/D are making the decisions and devaluing it.

Never consulted; advice not sought; and given advice ignored.

3. EAL/D program organisation & pedagogy

The Department of Education has systematically diminished the EAL/D team centrally located and left EAL/D programs (support in mainstream and IECs) at the mercy of mainstream admin teams.

EAL/D students are often grouped with Learning Support students and supported with inappropriate teaching strategies.

EAL/D is cancelled when other grade priorities clash.

EALD support is quickly transferred to a literacy position with no specialised support for second language learners.

Our EAL/D students are being treated as native English speakers. Their second language acquisition process has been given no consideration. Our school uses same methods, programmes and resources in the mainstream classrooms to teach English to our EAL/D students, including the new arrivals.

Schools are going for 'programs' that do not take into consideration the language needs of the students. EAL/D students, who do not have sufficient English language to draw upon, fall behind as requirements increase.

The school does not promote and value EAL/D and believe that EAL/D students "catch up" with mainstream.

The program has essentially been de-valued. Programs are easily collapsed and EALD staff is used to cover staff training and programming!

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Notes

¹ The term ‘English as a Second language (ESL)’ was replaced by ‘English as an Additional Language or Dialect’ (EAL/D) after the publication of the *ACARA EAL/D Learning Progression* (ACARA, 2011) to include Aboriginal language or dialect speakers learning English as an additional language. Although EAL/D is used throughout the article, its focus is EAL, that is, policy and provision affecting migrant and refugee English language learners which has developed separately from policy for First Nations students.

² During this policy hiatus, the NSW Liberal Coalition Government’s sign-up to the Gillard Labor Government’s school funding plan, the National Education Reform Agreement, on 23 April 2013, was influential in encouraging other reluctant state and territory governments to signing on to the reform (Greenwell & Bonnor, 2022).

³ This exclusive focus on disadvantage was criticised by Kenway (2013) as an inadequate approach to equity, as it fails to recognise that educational advantage and disadvantage are mutually constituted, and leaves the social and education segregation of schools and fundamental resource maldistribution unaddressed. See also: Connors and McMorro (2015).

⁴ Answers to Senate Estimate questions on Notice SQ18-650, SQ18-651, SQ19-129. Answer to Question on Notice SQ18-651

⁵ Answer to Senate Estimates Question on Notice SQ19-132

⁶ Answer to Senate Estimates Question on Notice SQ19-132

⁷ Analysis of answer to Senate Estimates Question on Notice SQ19-121.

⁸ The last (and only) public review of ESL funding for newly arrived students was the 2006 *MCEETYA Schools Resourcing Taskforce Discussion Paper Funding for English Second Language (ESL) New Arrivals Students*. The Taskforce Report found that estimated actual per capita costs for delivery of ESL New arrivals services to a newly arrived student in 2005 was \$6,160 for a non-refugee student and \$10,349 for a refugee and humanitarian student. When costs of the improved service provision needed to enable students to achieve reach a satisfactory standard of English were factored in, an amount of \$7,745 and \$18,730 respectively was required. The report recommended increasing the ESL New Arrivals per capita grant, including establishing a differential higher level of funding for refugee and humanitarian entrants with disrupted or no previous education. See report at: <https://files.eric.ed.gov/fulltext/ED534658.pdf>

⁹ The analysis concluded that the “disadvantaged LBOTE” measure not only significantly *underestimates* the size of the cohort needing EAL/D support but it also *does not capture the right students* and therefore should not be used to identify the English Language Proficiency (ELP) loading for EAL/D students. It estimated that using “disadvantaged LBOTE” as a proxy for English language proficiency suggests that 74.7 per cent of the \$100 million earmarked by Gonski-funding for limited English language proficiency would be misdirected to students who do *not* require EAL/D support.

¹⁰ Answer to Senate Estimates Questions on Notice SQ19-133

¹¹ The areas of impacts of school autonomy policies on EAL/D programs are identified in ACTA’s submission to the 2017 *Inquiry into Migrant Settlement Outcomes*, p. 57-73

¹² There is no public reporting of schools’ EAL/D funding or staffing allocation by jurisdictions.

¹³ See ACTA *Submission to the Joint Standing Committee on Migration Inquiry into Migrant Settlement Outcomes*, May 2017; Answer to 2018 Senate Estimate question on Notice SQ 18-650 indicates that current

accountability requirements are met through internal financial acquittal statements issued by a qualified accountant certifying compliant use of bulk funds.

¹⁴ In 1992, ESL education officers in South Australian, Victorian and NSW public education systems advocated for an ESL profile be added to the National Statements and Profiles as part of the National Collaborative Curriculum and Assessment Project. The Australian Education Council's Curriculum and Assessment Committee (CURASS) accepted the student access and equity arguments and subsequently established and commissioned a national ESL writing team from the three proposing education systems to develop the *ESL scales* (1994) as a supplementary profile to the eight learning area profiles (Lokan, 1997). In this event, the ESL education officers, as employees in their education systems, acted as 'insider' policy entrepreneurs.

¹⁵ The influence of the national assessment tool was limited, however, by the mixed support of state and territory jurisdictions, some of whom had developed their own EAL/D assessment tools. In 2015, A national project under the Education Council developed a national assessment framework designed to enable alignment of jurisdictions' EAL/D assessment tools with the EAL/D Learning Progression. A further national project to review the work in 2019 was discontinued in 2021 after the disbanding of the Education Council and COAG in 2020.

¹⁶ Although the *Elaborations* were initially developed with AITSL support, in the end, the document was not incorporated within the AITSL standards framework and therefore had no status or effect in the national system of teacher regulation.