

**INQUIRY INTO PLANNING AND DELIVERY OF SCHOOL
INFRASTRUCTURE IN NEW SOUTH WALES**

Organisation: Australian Education Union New South Wales Teachers
Federation Branch

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AUSTRALIAN EDUCATION UNION
NEW SOUTH WALES TEACHERS FEDERATION BRANCH

SUBMISSION TO

Portfolio Committee No.3 – Education
Legislative Council

ON

**Inquiry into the planning and delivery of school infrastructure in
New South Wales**

Authorised by

Maxine Sharkey
General Secretary
AEU NSW Teachers Federation

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The Australian Education Union NSW Teachers Federation Branch (the Federation) represents teachers in all public education workplaces in NSW. Current financial membership totals over 64,000 teachers in NSW public schools (primary, secondary, schools for specific purposes/SSPs and juvenile justice centres) and TAFE Colleges.

Opening remarks

The Federation welcomes the opportunity to make a submission to the Legislative Council's Portfolio Committee No.3 *Inquiry into the planning and delivery of school infrastructure in New South Wales* (the inquiry).

The Federation's policy on school infrastructure is articulated in its State Council decision of September 2014 "*Quality Teaching and Learning Infrastructure and Facilities*". It is, in part, as follows:

"Successive NSW Governments have failed to commit sufficient funds for both capital works and maintenance in public schools.

"Quality teaching and learning needs to be supported in educational environments which:

- are well maintained*
- have effective heating in winter and cooling in summer*
- have space in classrooms to facilitate innovative teaching and learning strategies*
- accommodate the infrastructure to support effective use of technologies, and*
- provide the necessary physical and other adjustments to support students with disability.*

"The NSW Government must commit to provide public schools the resources necessary to:

- prevent overcrowding in classrooms and staffrooms*
- provide safe and appropriate furniture and equipment to support teaching and learning*
- remove unflued gas heaters and ensure schools have sustainable heating and cooling systems*
- address trip hazards*
- ensure effective cleaning*
- establish a program to replace demountable classrooms with permanent classrooms"* (New South Wales Teachers Federation, 2014).

Further, the Federation acknowledges the inconvenient truths of the NSW Auditor-General's Report earlier report entitled *Planning for School Infrastructure 2017 (the 2017 Report)*:

- 'Improving education outcomes of students is a NSW State Priority. Research shows that well designed and maintained facilities improve student learning outcomes. A strategic objective of the 2014 State Infrastructure Strategy Update is to 'equip growing*

populations with the modern schools and training infrastructure required to deliver education service for a competitive, innovative economy' (page 2).'

- For the ten years to 2017, successive NSW governments have chronically underfunded investment in the school infrastructure required to cater for growth. This has resulted in the routine deferral of critical projects. The 2017 report recommended that a Ten Year funding commitment, a funding model that was already available to Health and Transport, should be made available to Education by NSW Treasury to fund the number of fit-for-purpose student places to 2031.
- Local schools generate a sense of community and, therefore, it is essential for school planning and delivery that the Department of Education collaborate not only with other government agencies, school sectors and local government but also with the local community.

The Federation notes the terms of reference for the inquiry and wishes to make submissions on each of the terms.

(a) Implementation of recommendations of the 2021 Auditor-General's Report entitled *Delivering School Infrastructure*

The Federation notes the recommendations of the 2021 Auditor-General's Report, all of which put the onus on the Department of Education:

1. **To finalise its investment prioritization with agreement from key stakeholders.** On this point, the Federation asserts that the Federation as a representative of the teaching profession and advocate for public education warrants inclusion in this process.
2. **To finalise a ten-year list of priorities to meet the forecast demand for new classrooms and contemporary fit-for-purpose learning environments.** The Federation is supportive of this recommendation as a means for delivering infrastructure in both a timely and educationally useful way for teachers and students. Teachers and principals should be consulted for their input into fitness-for-purpose designs.
3. **To seek a ten-year capital planning limit from NSW Treasury to meet the above priorities and co-ordination with the programs of other agencies.** The Federation is of the view that NSW Treasury must approve and fund all appropriately reasoned project requests for NSW public school students.
4. **To improve the quality of data on cost benchmarks that underpin the annual ten-year Capital Investment Plan and updates to the School Assets Strategic Plan.** Federation is of the view that NSW Treasury must approve and fund all appropriately reasoned project requests for NSW public school students. Additionally, the Federation is supportive of measures that minimize the privatization of government funding for school infrastructure construction.

5. **To embed an evidence-based cost-benefit analysis framework for school investment, in consultation with NSW Treasury.** Federation is of the view that NSW Treasury must approve and fund all appropriately reasoned project requests for NSW public school students
6. **To regularly share data on forecast needs with relevant planning agencies to promote strategic opportunities for servicing education needs.** If this recommendation is about cost/information-sharing between government agencies to improve school infrastructure for NSW public school teachers and children, the Federation is of the view that NSW Treasury must approve and fund all appropriately reasoned project requests for NSW public school students.
7. **To implement the continuous improvement program for service planning, options assessment, business case development, project delivery and handover. The program should be informed by findings from assurance reviews, post-occupancy evaluations and project lessons learned.** The Federation is supportive of measures that improve the planning and delivery of quality, fit-for-purpose school infrastructure. The recommendation also highlights the importance of consultation of teachers and principals from at least the assessment/planning stage of projects.
8. **To establish benefits realization processes and practices that:**
 - **ensure business cases set baselines and targets for benefits**
 - **review benefits during delivery, prior to handover and as part of Post Occupancy Evaluations**
 - **identify which parts of the Department are best placed to develop, manage and evaluate benefits on an ongoing basis.** The Federation is concerned that efficient planning and delivery must not be at the expense of quality and fit-for-purpose teaching and learning environments. Additionally, the Federation asserts that the Federation and teachers and principals should be consulted, as members of/representatives of the teaching profession, on the value of benefits realized – teachers and principals should be involved at the level of individual projects; the Federation should be involved at a global/governance level.

Accordingly, the Federation is supportive of the report's recommendations, though with qualifications.

(b) The adequacy of plans by the NSW Government to deliver educational facilities for every NSW public school student

Projections for NSW public schools to the year 2031, released by the Department of Education in 2021 under the Government information (Public Access) Act 2009 (Ref: GIPA-18-132), show that between 2020 and 2031 there will be a 17% increase in student enrolments. This equates to an 18% increase (88,595) in primary school students and a 15% increase (48,823) in secondary school students (Rorris: April 2021 – *NSW Public Schools to 2031: Impact of Enrolment Growth on Demand for Teachers*, p. 10).

However, the Department of Education (the Department) does not currently have sufficient classrooms to cater for such growth. The Department estimated that an additional 7,200 classrooms are needed in the 15 years from 2016-2031 to cater for such growth (Department of Education, 2016).

Nor has the Department accounted for any kind of plan to show how it will deliver the 7,200 additional classrooms needed over that time period. Further, no obligation has been imposed on the Department to develop such a plan, because there is no substantial funding commitment by the NSW government and Treasury for a long-term plan if it were to exist.

(c) The adequacy of investment in new or upgraded infrastructure at existing NSW public schools and in new school projects, including:

(i) Management

The Department should be required to account for a comprehensive plan to show how it will deliver the 7,200 additional classrooms needed for the anticipate growth in student enrolments in NSW public schools.

No obligation has been imposed on the Department to develop such a comprehensive plan, because there is no substantial funding commitment by the NSW government to deliver such a plan, were it to exist.

(ii) planning

The Department of Education's *School Assets Strategic Plan, 2016* identified that, in the 15 years to 2031, based on forecast population growth, an additional 7,200 classrooms will be needed for NSW students.

To enable this, the Auditor General, in her *Planning for School Infrastructure 2017* report (the 2017 Report), recommended that the Department of Education (the Department) "seek a ten-year capital planning limit from NSW Treasury" rather than a year-to-year funding commitment.

However, a ten-year funding commitment has not been forthcoming from the NSW government. This is not for want of attempts by the Department. According to its formal response to the 2017 Report, a letter from the Secretary Mr Mark Scott to the Auditor -General dated 2 May 2017 (Appendix 1 of the 2017 Report) states that "Negotiations are underway with NSW Treasury to implement a 10 Year Capital Planning Limit".

Notwithstanding this, it is of great concern to the Federation that the NSW Audit Office, in its report *Delivering School Infrastructure (April 2021)*, reports that the NSW government has not allocated sufficient capital funding to School Infrastructure NSW (SINSW) to construct the 7,200 additional classrooms required in public schools within the ten years to 2031, that is "for 2023 and beyond (page 2)".

Funding certainty is essential for school infrastructure planning and delivery. The NSW Government continues to abrogate its responsibility to resource the Department for meeting the need for additional classrooms to 2031. The NSW Government continues to allocate nothing beyond each budget to SINSW on an annual basis. As a result, School Infrastructure NSW (SINSW), since its inception in 2017, has only been able to develop a planning and delivery strategy that is confined to single or two-year cycles since its inception in 2017. This includes its current *2021-22 Delivery Strategy*.

(iii) Design

The Federation's articulation of its policy on school design is best captured in its Annual Conference Decision of 2015 entitled *Quality environments for teaching and learning*. The decision, in part, is as follows:

"The Government has described the capital works projects for new and refurbished classrooms as being 'future focussed', which are able to accommodate the diverse learning needs of students.

"The Department has provided an overview of the 'educational guidelines', which must be incorporated in the design of new learning spaces and schools. The guidelines include reference to the need to focus on the needs of learners and learning, building community identity, being aesthetically pleasing, providing contemporary sustainable learning, supporting the full range of teaching strategies, providing seamless access to IT and integration of resources, maximising the use of natural environment, enabling the building and outdoor learning spaces to be learning tools which are age and stage appropriate.

"Schools and learning spaces must be designed as quality learning environments for teaching and learning. The test of these guidelines and the 'future focused learning space' will be that they provide quality learning environments and are not developed as cheap, quick fix solutions to the rapid growth in student enrolments....Federation sought and received a commitment from the Department that it would consult with the Federation and the school community about:

- *The design and development of new schools*
- *Any disruption created by relocation, refurbishment and/or new building projects*
- *Any industrial/professional issues that relate to the design and development of new learning spaces and schools"* (New South Wales Teachers Federation, 2015).

As a consequence, the Federation strongly asserts that the funding of school and building design, including the recently adopted Design for Manufacture and Assembly (DfMA) process for rapid builds, when used must enable the overriding consideration that the design is fit-for-purpose: that is, the funding must support designs for quality educational spaces for teachers and their students using the full range of teaching and learning strategies, as outlined above. Design must follow pedagogy, not the converse.

(iv) Construction

The Federation does not have access to data on the adequacy of funding for construction to meet costs. Nor does the Federation have data on any increased or unexpected cost rises in construction.

(v) Maintenance

The Department, through Schools Infrastructure NSW (SINSW), congratulated itself on its website in July 2020 for having cleared its school maintenance backlog:

“You may have heard about our plan to clear the school maintenance backlog, and this was achieved in July 2020 (School Infrastructure NSW, 2022).”

If anything, this claim only reflects the Department’s definition of school maintenance backlog and the NSW government’s funding model for maintenance. The maintenance backlog refers only to the Department’s self-selected list of projects for school maintenance, based on assumed lifespans of items such as paint, carpet and tiles. Additionally, the claim reflects limitations on the amount of funding that NSW Treasury has approved for identifying planned school maintenance.

By no means is this a claim that the appearances of public schools and their infrastructure are new and in no need of maintenance. This was explained by the then Secretary of the Department in Budget Estimates:

“But as you know around maintenance, that does not mean that come 1 July there are no more maintenance chores to be done. So there will be some schools that now have significant maintenance work that needs to be done. That is what has fallen due. That is what they need to go to work on. So more maintenance continues to need to be done now, despite that overarching backlog being cleared away. ...Part of maintenance of this kind of infrastructure is that over a period of time rooms will be done, gutterings will be done, all sorts of other work will be done. There will be some schools this year that will turn around and it will be time for their roofs to be done. That is what the maintenance timetable will mean: That even though the backlog has gone—stuff that maybe should have been done in 2014 or 2015 has been cleared—the stuff that needs to be done in 2021, that is the work that we are doing now (Portfolio Committee No.3, 3 March 2021, p.81)

Federation members’ response to the claim, as recorded in an Annual Conference Decision in September 2021, is as follows:

“What this [claim] looks like on the coal face is simply not the fact. Schools across NSW are in a state of disrepair...Federation calls on the NSW Government to take action to ensure public schools are well maintained and fit for purpose” (New South Wales Teachers Federation, 2021).

Additionally, a Federation Annual Conference Decision in 2008 encapsulates Federation policy that NSW Treasury, not school communities themselves and the teachers who work in them, should bear responsibility for the adequate funding of maintenance:

“The maintenance of our public schools should not rest on the goodwill of public school teachers and the hard-working school communities who fundraise and provide working bees” (New South Wales Teachers Federation, 2008).

(vi) budgeting and expenditure of new projects

The Federation is unable to comment on whether the Department, with the funding it is granted, meets or exceeds cost projections on a per-project basis or otherwise.

However, the Federation is deeply concerned that public schools in NSW obtain no funding for capital investment from the Federal Government since shortly after the Building the Education Revolution (BER), while all private schools already have access to billions of dollars in capital grants from both the State and Federal Governments.

Analysis by Adam Rorris (2021) of capital investment in school facilities, equipment and buildings shows that:

- A cumulative capital investment gap in NSW of \$11,971 has existed between 2009 and 2018 per public school student, compared to students in non-government schools (Rorris, 2021, p.51);
- Acceleration of capital investment program funding would heed the calls of many economists, including the Deloitte consulting agency, for governments to engage in aggressive capital spending programs to deliver growth and future economic prosperity (Rorris, 2021, p.7)

The re-elected Morrison government, in 2019, announced \$1.9 billion in capital works funding for non-government schools over 10 years, without a single dollar in federal funding being committed to public schools.

In this context, NSW state government provision of record capital grants to non-government schools is at the expense of government schools. This includes the \$500 million over 4 years announced by the Berejiklian government as *“Record support for non-government schools”* during the 2019 State election campaign (Berejiklian, 2019). It also includes the forward estimates of the 2021-22 state budget, which show that the \$3.44 billion in capital investment in NSW public schools in 2021-22 drops to between \$1.6 and \$1.75 billion every year for the next three years. The Morrison government’s willful blindness to public schools together with the NSW Government’s planned decline in the funding of capital investment in public schools demonstrates a failure of public policy.

Further, the lack of transparency of the NSW government over its response to funding requests by School Infrastructure NSW (SINSW) for new projects is deeply concerning. The NSW government must identify School Infrastructure NSW’ new project business cases that are currently awaiting approval from Treasury for planning and delivery and fund them if NSW is to meet the 7,200 additional classrooms required in NSW between 2016 and 2031.

(d) The role of local community organisations and groups in responding to the lack of or shortage of educational facilities at any NSW public school especially in areas of high growth and in proposed new suburbs

The Federation acknowledges that local schools generate a sense of community and, therefore, it is essential for school planning and delivery that the Department of Education collaborate with the local community (Audit Office of NSW, 2017).

The Federation is known to act in partnership with community members of local schools on school planning and delivery issues to press for improved funding commitments for school infrastructure. A recent example relates to Girraween Public School.

In July 2017, Federation member activism in concert with parents of students at Girraween Public School forced the then Minister for Education to develop a suite of solutions to school's overcrowding crisis. Some solutions were administrative (such as redesignation of feeder zones) and others were based on capital investment (such as an upgrade of the neighbouring Wentworthville Public School from 2019 to absorb some of the enrolment growth).

(e) The adequacy of demographic planning for anticipated school enrolments

Chronic underfunding for the planning and delivery of infrastructure sufficient for anticipated school enrolments has created a funding crisis.

Federation notes the strong possibility of medium to long-term gains abating quickly in some rapidly growing communities after handover of new builds and upgrades. The example of The Ponds High School and Riverbank Public School are a case in point.

After opening in 2015, adjoining schools The Ponds High School and Riverbank Public School quickly exceeded their planned permanent classroom space. By 2020, the two schools between them needed to install 70 demountables to provide classroom space to cater for burgeoning enrolments in their fast-growing feeder suburbs. Additional capital investment in the two schools urgently required.

That such underinvestment in suitable infrastructure for the children of NSW, on the basis that they will attend their local public school, still exists is a blight on the NSW government's record of providing for children and young people in this State. It mocks the NSW governments' self-congratulations on its record investment in infrastructure for non-government schools.

(f) Delays in converting new school announcements into site identification and school construction

Delays of this kind can be accounted for by the funding shortfall and short-term funding approval model imposed by the NSW government on the Department of Education. It is unacceptable to the Federation and to local communities when school communities have to wait for the so-called "shovel-ready" stage of a Ministerial announcements. Ribbon-cutting occasions on project handover should be far more appealing to Ministers than the making of promises of future construction.

(g) Specific planning for new schools and increased enrolments in Western Sydney, the Canada Bay local government area and on the far north coast

The Federation notes the need for additional classrooms in these areas and throughout NSW generally.

Curiously, the Federation also notes that no new major works and no works in progress papers for schools located in the Canada Bay local government area are reported in Budget Paper 3, Chapter 5 of the 2021-22 budget papers (Portfolio Committee No.3, 2021).

The Federation does not have access to data to assess whether there are appropriate levels of planning for the numbers of new or additional classroom spaces required by projected growth in these areas to 2031. Therefore, the Federation is unable to comment on the adequacy of funding and planning by the NSW government and the Department of Education for future enrolment growth in these specific areas.

However, the Federation is able to comment that an urgent need for additional classrooms and new schools should not set aside the obligation for the Department to provide infrastructure that is both fit for educational purpose and is the result of a consultative process with the teaching profession for planning and delivery. This is underscored by the experience of recent school amalgamation processes.

On 28 October 2020 the Deputy Premier and Minister for Education announced plans for Murwillumbah Education Campus. The announcement signified an amalgamation of four schools on the Far North Coast: Murwillumbah Primary School, Murwillumbah East Primary School, Murwillumbah High School and Wollumbin High School (Barilaro, 2020). The announcement was without any consultation with staff, community groups including the local Parents and Citizens Associations or the Aboriginal Education Consultative Group.

Significant community opposition arose from both the concept of amalgamation and the Department's failure to consult relevant groups under the protocols. The announcement by itself also breached a statutory obligation to consult the school community on proposed amalgamations, closures and recesses under section 28 of the *Education Act 1990*.

The Department failed to implement its *Protocols for schools where recess, closure, amalgamation or other educational provision models are to be considered (2014, updated February 2017)* (the Protocols), which it had established to facilitate compliance with its statutory obligations.

The Protocols require that the Department seek the views and input, through local consultation, of affected parties through the establishment of a School Consultative Group (SCG). The SCG is to consist of the Director Educational Leadership, Principals of impacted schools, Parents & Citizens representatives, departmental officers from Human Resources and Asset Management and the local NSW Teachers Federation Organiser. Its role in the review/planning for school amalgamation proposals is outlined in the Protocols, including consideration of the case for amalgamation, considering arrangements for staffing/finance/assets if implemented and keeping records of the consultation process for transparency.

Having caused significant harm to the Murwillumbah community by its failure to consult under the *Education Act*, the Department in a letter to the Federation admitted to side-stepping its own protocols on consultation. Additionally, it confirmed the worst fears that a 20% reduction in staff numbers based on combined student numbers would flow from the amalgamation, including principals, executives, classroom teacher and other specialist teacher positions.

(h) School design that promotes health and safety; and

School design should, as far as possible, promote not hinder learning. Analysis by education economist and policy analyst Adam Rorris (2021) in his report *Investing in schools: Funding the future* found a causal relationship between capital investment in school infrastructure and the quality of schooling/learning. He points to extensive research conducted by the Education Commission of the USA, including research by Mark Schneider in 2002 on hazards related to infrastructure that affecting learning:

“Spatial configurations, noise, heat, cold, light, and air quality obviously bear on students’ and teachers’ ability to perform. ... But we already know what is needed: clean air, good light, and a quiet, comfortable, and safe learning environment (Schneider, 2002, p.16)”.

These infrastructure-related hazards are in the control of the Department as a person conducting a business or undertaking under the *Work Health and Safety Act 2011*. Accordingly, the Department has the primary obligation to manage hazards to eliminate or minimise risks of harm.

Exposure to excess noise

Flexible spatial configurations in new school designs have become a fad. The use of removable partitions between adjoining classroom spaces to create so-called “open classrooms” gives rise to issues including exposure to excess noise. Where school design of this kind is delivered, there must be consideration of acoustic effect to minimize distraction and potential stress caused by external noise. Additionally, with so-called ‘open classrooms’, removable partitions between classrooms either do not themselves sufficiently prevent external noise when refitted or are not always available.

Poor indoor air quality

Arising from the recent 2019 bushfire emergency in NSW and the COVID-19 pandemic, the adequacy of funding/investment in access to fresh indoor air and the ventilation of classrooms has arisen.

At the time of making the submission, the Federation has a live dispute with the Department notified to the NSW Industrial Relations Commission on 15 October 2021 on indoor air quality in NSW public schools. The dispute includes matters such as access to information on the

Department's assessment of air quality in all NSW public school classrooms and remedial action addressing the need for improvement. What is clear to the Federation is that the Department has been underfunded by the NSW government for maintaining and improving school facilities to ensure access to fresh indoor air and adequate ventilation.

Thermal discomfort

Where school design itself is unable to minimize exposure to heat extremes, the Department has an obligation to identify, fund and implement alternative means of risk minimisation. This includes engineering controls, such as air conditioning. This too requires substantial funding by the NSW government.

The Department's so-called Cooler Classrooms project, developed by the NSW government as a 2019 NSW state election promise, has delivered funding of \$500 million in the budget periods between 2018-2023 for the installation of air-conditioning units for classrooms, prioritizing those with a mean January temperature of 30 degrees Celsius. Additionally, the program has included installation of solar panels to offset a consequential increase in the use of power. NSW Government budget papers for 2021-22 show that the final \$164 million of the promised expenditure was allocated to complete the program. However, not all schools have benefitted. 582 schools which applied for the program were rejected. 187 schools which applied for the program and were approved are still awaiting delivery of the air-conditioning units as of 6 December 2021 (Mitchell, 2021). Examples of the latter include Bidwill Public School, Elizabeth Macarthur High School, Ellison Public School, Harrington Park Public School, Kandos Public School, Karabar High School, Kelso Public School, Lismore Public School, Luddenham Public School, Macksville High School and Macksville Public School, Millers Forest Public School, Minchinbury Public School Quakers Hill East Public School and Queanbeyan West Public School, where the mean January temperatures are half a degree below 30 degrees (Mitchell, 2021).

Rising global temperatures and the replacement of unflued low-NOx gas heaters with split-system air-conditioner units in NSW public schools require further funding of the Cooler Classrooms program. The Federation calls on the NSW government to increase its funding for the Cooler Classrooms project.

Unflued gas heaters

Where school design itself is unable to minimize exposure to cold extremes, engineering controls should not themselves generate other unacceptable risks. Unflued gas heaters in NSW public schools remain a risk to health and safety.

The 2010 Woolcock Institute of Medical Research report (the Woolcock Institute research paper) on the use of unflued, as opposed to flued, low emission gas heaters in NSW school classrooms identified potential hazards. Indoor exposure to emissions of nitrogen oxides, including nitrogen dioxide (NO₂), and in some cases formaldehyde and carbon monoxide from so-called low-NOx unflued gas heaters was found to "*increase respiratory symptoms particularly in [people with asthma] but was not associated with measurable adverse changes in lung function*" (Marks, Ezz, Aust, Toelle, Xuan et al, 2010, pp. 481-482)".

The overall finding of the Woolcock Institute research paper was that “*Although ... severe adverse consequences are unlikely in the short term, the increased burden of symptoms and the observation of higher levels of [nitrogen oxide emissions] in the sub-group with asthma suggest an adverse effect that is best avoided. It is important to seek alternative sources of domestic and public space heating that to do not have adverse effects on health but are also effective and efficient for heating and have a favourable environmental profile* (Marks, et al, 2010, p.482)”.

The Department’s position is that sufficient remedial action has been taken on unflued gas heaters. Purported remedial action includes the removal of all unflued Hi-NOx gas heaters and their replacement with unflued Lo-NOx gas heaters or air-conditioning units, together with issuing Safety Alerts on ventilation requirements for unflued Lo-NOx gas heaters (Department of Education, 2014; Department of Education, 2018). Additionally, the Minister for Education, Sarah Mitchell MLC, on 5 August 2020 assured the Legislative Council that “Low NOx unflued gas heaters were safe” (Mitchell, S. MLC, 5 August 2020) and informed Budget Estimates that “The majority of schools have unflued gas heaters” and that “An accurate list of heating facilities in NSW public schools is not available at this time”.

The Federation is of the view that NSW Treasury should provide the Department sufficient funding to replace all unflued Lo-NOx gas heaters with appropriate sources of heating, in line with the findings of the Woolcock Institute research paper. Until then, Federation members in school communities, such as Uralla Central School in the New England region on 10 December 2021, have donned blankets and have called for the replacement of unflued low NOx gas heaters in their schools without adequate response from the Department.

Inadequate staff accommodation

New and upgraded school facilities must include space for teacher collaboration, for car parking (given teachers’ need to carry teaching resources and student work samples between work and home) and timely access to amenities (especially given that school day organization creates periods of peak demand for access to amenities). Teacher and staff accommodation must include conditions that at or above the standards set by SafeWork NSW in its their [Code of Practice: Managing the work environment and facilities \(nsw.gov.au\)](https://www.safework.nsw.gov.au/code-of-practice-managing-the-work-environment-and-facilities).

Conclusion

For too many years, successive NSW Governments have underinvested in the school infrastructure required currently and for the future. This has been compounded by the withdrawal of federal funding for capital investment in public schools nationally in recent years.

What is desperately needed is a new mechanism for NSW Treasury to provide longer-term funding approval for capital investment and maintenance in public schools. The onus of planning and delivering appropriate, timely, high quality and fit for purpose school infrastructure rests not only on the Department of Education, but primarily on the NSW Government.

The recommendations of the Auditor-General's report *Delivering school infrastructure (2021)* require enabling actions on the part of NSW Government, including the adoption of a ten-year model for capital investment funding approval and greater priority for public schools, where the heavy lifting is done. This Inquiry is an opportunity to make the obligation for enabling action clear to the current and to future NSW Governments, for the sake of all children of NSW.

Federation appreciates the opportunity to provide this submission regarding the Inquiry and urges the Portfolio Committee to consider these points.

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