

27 June 2025

Dr Charlotte Keating &
Dr Jo Robinson AM
Review Co-chairs

Department of Education
GPO Box 9880
Canberra ACT 2601

Submitted: https://submit.dese.gov.au/jfe/form/SV_5h7K6hR5UFjAI9U

Dear Review Co-chairs,

NTCOGSO Response to the Department of Education's Anti-Bullying Rapid Review

The Northern Territory Council of Government School Organisations (NTCOGSO), as the peak parent body for families in Northern Territory government schools, acknowledges the Australian Government's leadership in developing a **national standard for responding to bullying and its underlying causes in schools**.

We welcome the opportunity to contribute to the *National Anti-Bullying Rapid Review* and recognise the importance of establishing a consistent approach that promotes safe, respectful and inclusive learning environments for every student. This is equally an important opportunity to strengthen alignment across systems and ensure every student, in every school, is better protected from the impacts of bullying.

A well-designed national standard can give families confidence that, regardless of location or school sector, bullying will be identified, addressed and managed in a fair and effective way. This is especially critical for children and young people who may already face disadvantage or marginalisation.

We welcome the expectation outlined in the **National School Reform Agreement (NSRA)** for all jurisdictions to work toward inclusive, safe and respectful learning environments. The NSRA reform priorities provide clear national direction for improving student wellbeing and school engagement.

We also welcome student wellbeing as a named and funded component of the Northern Territory's **Better and Fairer Schools Agreement (BFSA)**.

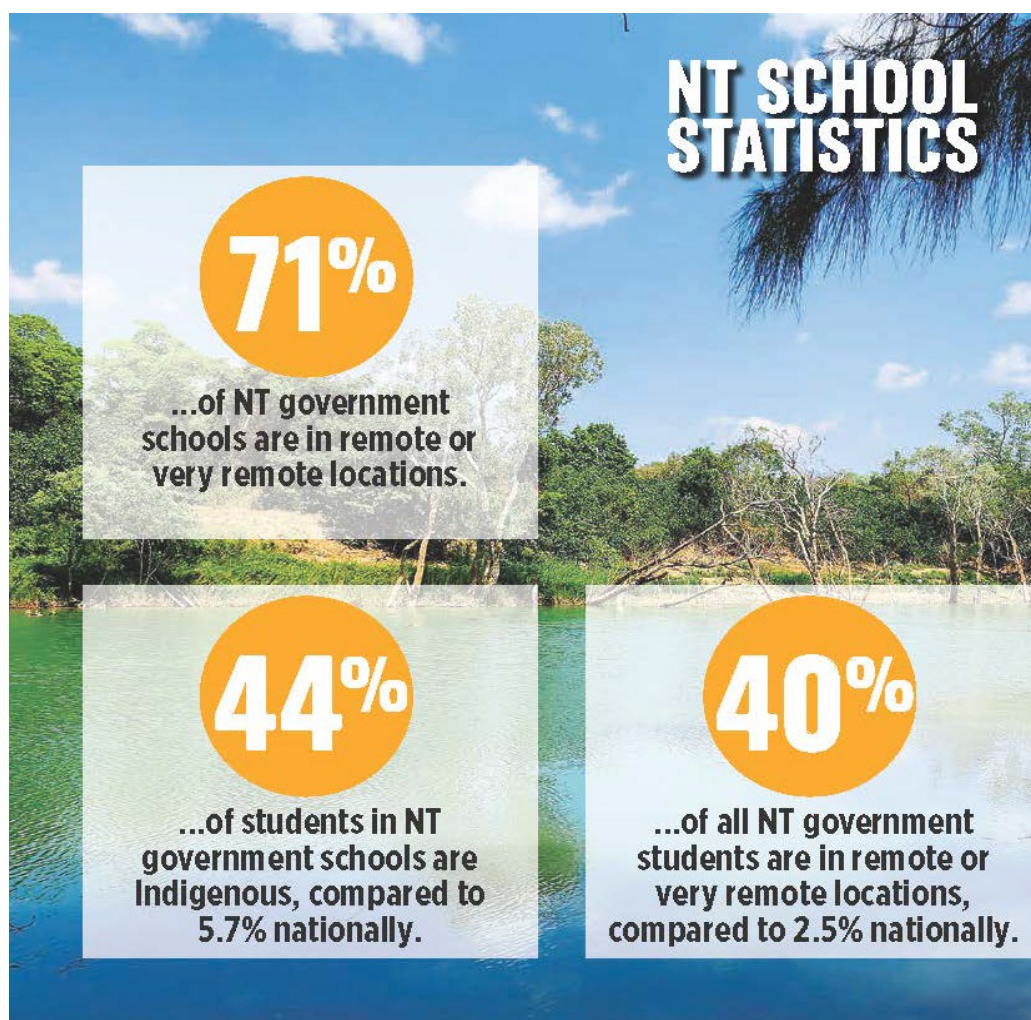
This creates a strong practical expectation that families will see meaningful improvements in student wellbeing resources and services, particularly in remote and disadvantaged communities.

While we acknowledge the time constraints of a Rapid Review, we note with concern the lack of targeted consultation with remote communities and Aboriginal families.

As outlined in our submission to the Review, we urge further engagement with these recognised national priority cohorts to ensure actions reflect the diversity of school communities across the Northern Territory.

Our context

Northern Territory public education is shaped by unique and often complex challenges.



71% of NT government schools are in remote or very remote locations.

44% of students in NT government schools are indigenous, compared to 6% nationally.

40% of all NT government students are in remote or very remote locations, compared to 2.5% nationally.

1. National Framework | National Standards to address bullying.

The development of National Standards presents an important opportunity to embed a consistent, rights-based approach to preventing and responding to bullying in Australian schools, grounded in cultural responsiveness and clearly defined expectations.

- Embed a rights-based approach that upholds the safety, dignity and participation of every child.
- Establish a culturally adapted definition of bullying, co-designed with Aboriginal families and educators, to reflect the language and lived experience of communities.
- Co-design and set minimum expectations for culturally responsive practice in all schools, including clear responsibilities for prevention and early intervention.

Recommendation 1: That the National Standards establish rights-based and culturally responsive expectations to guide jurisdictional policy and practice.

2. National Framework | Culturally Responsive Definitions.

NTCOGSO supports a consistent national definition of bullying. However, it is essential that any national definition reflects the diversity of cultural and linguistic contexts across Australia.

In many Aboriginal communities, particularly in remote regions of the Northern Territory, the term 'bullying' is not commonly used. Instead, behaviours that would meet the national criteria are more likely to be described as 'teasing', 'shaming', or understood within cultural and kinship frameworks. Without recognition of this distinction, harmful behaviours may be misinterpreted, minimised or overlooked.

To address this, NTCOGSO recommends that the national definition include an additional explanatory note or culturally responsive footnote, such as:

"This definition includes behaviours that may be described or understood differently in Aboriginal and Torres Strait Islander communities. In some contexts, terms such as 'teasing' or 'shaming' may refer to conduct that meets the threshold of bullying, even where the word 'bullying' is not used. The intention is to ensure that harmful behaviours, regardless of terminology, are recognised and appropriately addressed."

Recommendation 2: Expand a National definition to include culturally distinct terminology and understanding.

3. Students with Disability.

Students with disability experience disproportionately high rates of bullying, exclusion and harm in Australian schools. The findings of the Disability Royal Commission clearly highlight the long-term impacts of bullying on mental health, educational outcomes and ongoing trauma.

National Standards to address bullying should explicitly reflect and respond to the rights and needs of students with disability.

Despite the heightened risk, these students' experiences are often underreported, misunderstood or dismissed. This can occur when:

- Communication barriers or fear of reprisal prevent students from speaking up.
- A lack of inclusive practice or disability awareness leads to minimisation of harm.
- Behaviours are misinterpreted, especially when the student is neurodivergent or uses communication support.

To ensure equity and safety, the National Standards should:

- Be co-designed with students with disability, their families and representative organisations.
- Require professional learning in disability inclusion, communication support and trauma-informed practice.
- Include clear accountability expectations that uphold every student's right to feel safe, respected and included at school.

Recommendation 3: Prioritise the rights and needs of students with disability in National Standards.

4. Recognise the role of bullying in school refusal.

NTCOGSO welcomes the Australian Government's increased focus on school refusal. We acknowledge recent national discussions, including the 2023 **Senate Inquiry into School Refusal and Related Matters**⁴, which recommended a national action plan and improved cross-jurisdictional supports.

However, current frameworks do not fully connect the experience of bullying to the rise in school refusal and chronic absenteeism. This is a significant oversight given the following evidence:

Links between bullying and school refusal:

- Emotional distress from bullying, including anxiety and lack of connection, is regularly identified by students and parents as a major factor behind school avoidance (Monash University Student Wellbeing Study, 2023¹).
- Victorian research found that nearly half of senior students who skip school report bullying as a contributing factor, whether in-person or online (Orygen, 2023²).
- The Disability Royal Commission found that bullying can result in long-term trauma and lead to student disengagement. This is particularly true for students with disability, who may be more vulnerable and less able to report their experiences.
- Students with disability, neurodivergent students, and those from low socio-economic or Indigenous backgrounds are disproportionately represented in school refusal and chronic absenteeism data (Disability Royal Commission Final Report, 2023³).

In 2023, members of the NT Full Council moved the following motion:

Motion 1.3 School Refusal by Students | Department Support

"THAT NTCOGSO requests that the NT Department of Education establish distinct codes in the mandated student administration system to effectively record cases of 'School Refusal' to understand the prevalence and causes of school refusal. Furthermore, we request that the Department of Education undertake the following multi-tiered system of support:

- a) **Data Collection:** Establish an agreed definition of school refusal and develop strategies for effective intervention and support.
- b) **Professional Development:** Teachers and school staff receive professional development, training, and support from the department to recognise the signs of school refusal, differentiate it from truancy, and implement strategies to support affected students.
- c) **Early Identification and Assessment:** Implement a system for early identification of students at risk of school refusal. This includes screening programs to identify students at risk, particularly during key transition points (e.g., starting preschool or transitioning to middle or high school).

Further, conduct thorough assessments to understand the underlying causes of refusal, such as anxiety disorders, bullying or academic challenges.

- d) **Anti-Bullying Initiatives:** Implement anti-bullying programs and policies to create a safe and inclusive school environment. Address bullying incidents promptly and involve parents in resolution efforts.
- e) **Trauma-Informed Practices:** Support schools through additional resourcing to implement trauma-informed practices to create a more supportive and inclusive environment for students, including those experiencing school refusal. These practices are to recognise the impact of trauma on students' behaviour and well-being and respond with empathy and appropriate support.
- f) **Family-School Collaboration:** Support school staff to collaborate closely with parents and caregivers to understand and address the specific needs of students struggling with school refusal. Effective family-school engagement is crucial.
- g) **Provide alternative learning pathways:** Provide and publicise widely, flexible education delivery models, interest-led learning, remote learning, or alternative school settings. These options must aim to accommodate students who find traditional schooling challenging.
- h) **Mental Health Support:** Resource schools in mental health support for students. Provide access to early intervention school counselling for students experiencing anxiety or other mental health challenges related to school refusal. Ensure easy access to mental health resources for students and families.
- i) **Public Awareness Campaigns:** Launch an ongoing public awareness campaign to reduce stigma around school refusal and to educate parents, students, and the community about available support services.
- j) **Advocacy and Support Groups:** Identify advocacy groups and support networks for parents dealing with school refusal to provide information, resources, and peer support."

Recommendation 4: That the National Standards:

- Explicitly acknowledge the link between bullying and school refusal
- Integrate bullying prevention and response strategies into broader national work on improving attendance and wellbeing
- Prioritises early intervention for students withdrawing due to unresolved or ongoing bullying, and
- Improves national data systems to connect wellbeing, behaviour and attendance indicators, supporting systems and schools to respond early and effectively.

5. Consultation | Remote Aboriginal students, families, schools and cultural contexts.

The needs of remote NT Aboriginal students and families are not adequately addressed in current consultations or policy settings.

The Rapid Review process risks overlooking these voices. This reflects a broader systemic issue where engagement processes:

- Are too short for meaningful feedback.
- Fail to use first languages or culturally safe methods.
- Rely on digital access not available in many communities.

Future consultations should include extended timeframes, face-to-face options, and materials developed in consultation with community members.

Recommendation 5: Setting a minimum engagement standard for future national consultations.

6. Psychosocial hazards.

Children and young people should be protected from psychological harm at school in the same way that adults are protected at work. A national anti-bullying standard, treating bullying as a significant wellbeing and safety concern, to ensuring that schools have clear and consistent responsibilities to act.

Children and young people have the right to be safe at school. In Australian workplaces, adults are protected under legislation from psychological harm caused by bullying, harassment and other psychosocial hazards. Students deserve the same level of protection in their learning environments. A national anti-bullying standard should recognise bullying as a serious wellbeing and safety concern and establish clear and consistent responsibilities for schools to prevent harm and respond effectively.

Under the ***Work Health and Safety Act 2011*** and the ***Work Health and Safety (National Uniform Legislation) Act 2011 (NT)***, employers are required to manage psychosocial hazards that pose risks to psychological health and safety.

Safe Work Australia's ***Model Code of Practice: Managing Psychosocial Hazards at Work*** (2022) identifies key hazards including bullying, harassment and interpersonal conflict. These require prevention strategies, early intervention and effective responses to reduce psychological harm.

Similarly, the ***Commonwealth Child Safe Framework*** sets minimum standards to create and maintain child safe cultures across Australian Government entities.

NTCOGSO recommends that the National Standards adopt a comparable approach for schools. This would establish clear and enforceable responsibilities for recognising bullying as a psychosocial hazard and for protecting students through consistent, proactive practices.

Recommendation 6: Establish clear and consistent responsibilities for schools through the National Standards to identify, prevent and respond to bullying as a serious psychosocial hazard.

7. Relational aggression.

NTCOGSO urges national attention on relational aggression particularly between female students, which is frequently under-identified and under-reported. This includes behaviours such as social exclusion, spreading rumours, and emotional manipulation.

Schools need access to professional learning that builds capacity to identify, respond to and prevent this type of bullying, which can be as damaging as physical aggression.

In 2021 members of the NT Full Council moved the following motion:

“THAT NTCOGSO request that the Department of Education and Territory Families provide expert in-kind support, (if necessary, seek external expertise) and co-fund appropriate resources for the codesign, pilot and evaluation of, an evidence-informed school-based framework, policy and corresponding curriculum to address increasing rates of female-to-female aggression and violence between students.”

Recommendation 7: Address relational aggression in school communities.

8. Functional design of schools and playgrounds.

NTCOGSO urges the Australian Government to take national leadership in recognising the role that physical school environments play in preventing bullying and supporting student wellbeing. Evidence consistently shows that bullying is more likely to occur in unstructured and unsupervised spaces such as playgrounds, bathrooms and corridors. These areas often have limited adult presence, poor visibility and heightened social dynamics that increase the risk of peer conflict or harm.

Design standards to reduce these risks should be a core component of any national anti-bullying work. While some jurisdictions have design guidelines for new builds or refurbishments, there is no nationally consistent standard that embeds safety and wellbeing into the physical layout of schools. A national approach would help ensure that all schools, regardless of sector, location or funding model, prioritise functional design that protects and supports students.

Although work has been undertaken in the Northern Territory between government agencies and key stakeholders, including NTCOGSO, the Territory does not have endorsed standards or guidelines for the functional design of schools.

This creates inconsistencies in how infrastructure decisions are made and limits the ability to plan learning environments with safety and wellbeing in mind. A national framework or set of standards may offer an important opportunity for the Australian Government to provide coordinated guidance.

This issue is further compounded in the Northern Territory, where the government does not generate its own-source revenue to fund school infrastructure. Unlike non-government schools, which receive direct Commonwealth infrastructure funding, government schools are expected to rely on capital investment from State and Territory budgets. For the Northern Territory, this creates a persistent gap.

This is especially important in remote and regional communities, where ageing infrastructure and the standard of facilities falls well below what would be considered acceptable elsewhere in the country, creating environments that are not only unsupportive but at times unsafe. The lack of investment sends a clear message to students and communities that their learning environments are less important, which can further impact engagement, trust and school culture.

Recommendation 8: Develop National Standards for the functional design of schools and playgrounds that embed student safety, wellbeing and inclusive access as core design principles.

9. Resources for families.

Families in the Northern Territory, particularly EALD and Aboriginal families, need access to clear, accessible and culturally appropriate resources that supports them to understand and respond to bullying. To be effective, resources must be:

- Available in first languages, plain English and audio/visual formats to support comprehension and accessibility.
- Designed to clearly explain what bullying is and what it is not, using examples that are relevant across different cultural and community contexts.
- Focused on empowering families to engage with schools confidently, including how to raise concerns, seek support and follow up when needed.
- Adaptable to local community settings, including remote and regional contexts.
- Widely promoted through schools, parent organisations, community services and online platforms.

Recommendation 9: Develop nationally consistent and culturally appropriate resources for families.

10. Strengthening Initial Teacher Education (ITE).

Initial Teacher Education programs should be strengthened to ensure all new educators:

- Understand the definition and complexities of bullying, including cultural variations.
- Are trained to respond using trauma-informed and developmentally appropriate approaches.
- Undertake practicum placements where they observe and practice effective responses to bullying and relational conflict.

Resources such as the National Guidelines for Trauma-Aware Education provide a framework for integration and strengthening ITE.

Recommendation 10: Integrate Comprehensive Trauma-Informed Modules in ITE programs should include mandatory modules on trauma-informed practices, emphasising the impact of trauma on student behaviour and learning.

11. Build on what works.

Include in this Review's national scan consideration of successful and unsuccessful models for remote and high need communities.

Recommendation 11: A national scan of evidence-based anti-bullying models, including those successfully implemented in remote or high-needs communities.

12. Embed school-based mental health practitioners within the National Standards to support early intervention and prevention.

The National Standards should explicitly recognise the critical role of school-based mental health practitioners in supporting students with mild to moderate and emerging mental health concerns, including those affected by bullying. Where possible, practitioners should be permanently based in schools as a dedicated, early intervention service.

NTCOGSO has consistently advocated for this model since 2016. Our NT Council motions demonstrate sustained calls for:

- Access to qualified school-based mental health professionals
- Practitioner allocation based on school enrolment and student needs
- Integration of student mental health into broader wellbeing strategies and trauma-informed practice

In November 2024, NTCOGSO formalised its position through the adoption of a **School-Based Mental Health Services Policy**, which outlines the following minimum staffing ratios tailored to the Northern Territory context:

- Schools with fewer than 100 students: at least one part-time practitioner
- Schools with fewer than 500 students: at least one full-time practitioner
- Schools with 500 or more students: at least two full-time practitioners

These exceed the **Australian Psychological Society's** recommended minimum of one psychologist per 500 students and reflect the unique delivery challenges in our schools.

Practitioners must be qualified (e.g. psychologists, social workers, counsellors with Australian Counselling Association (ACA) or Psychotherapy and Counselling Federation of Australia (PACFA), or mental health-trained nurses) and able to:

- Assess student mental health needs
- Support students to manage distress and build coping strategies
- Contribute to referrals and case management for complex concerns
- Build mental health literacy across the school community

In remote school communities where permanent staffing is not feasible (lack of housing, remoteness), alternative support models must be:

- Approved through local community decision making
- Delivered face-to-face or through hybrid models in partnership with Aboriginal Health Clinics, ACCHOs, or qualified health outreach services
- Community-informed, culturally appropriate, and responsive to local needs

Importantly, online and telephone-based services should not be assumed to be viable alternatives in remote NT communities. Many schools experience unreliable connectivity, lack of private spaces, and limited student access to digital devices or mobile coverage.

Implementation of this recommendation should be supported by **Commonwealth funding**, recognising that the Northern Territory has no own-source revenue and faces unique barriers to access.

Recommendation 12: That the National Standards embed school-based mental health practitioners in all schools, with minimum staffing ratios and appropriate alternatives for remote settings.

13. Commonwealth support for National Standards implementation in the NT.

Commonwealth funding will be vital to support the successful implementation of any future National Standards, particularly in a jurisdiction such as the NT, where complex service delivery conditions, vast geographic and cultural diversity, and the **absence of own-source revenue** make sustained and targeted investment critical to success.

Without this investment, students in remote and under-resourced communities will remain at greater risk.

Recommendation 13: Ensure sustainable Commonwealth investment through tied funding to support the implementation of the new National Standards, with particular consideration for the unique needs of the Northern Territory.

14. Reframing language: Review of terminology for National Standards.

NTCOGSO recommends consideration of the appropriateness and impact of the term “anti-bullying” within National Standards.

There is growing recognition within Australian youth policy and practice that this term can be deficit-focused and reactive and may not resonate effectively with young people.

This perspective has led to a shift towards more strengths-based and inclusive language in youth engagement and program development. For example, terms such as ‘**Bullying Prevention**’ are increasingly used to reflect a more proactive and empowering approach.

While we use the term 'school refusal' in alignment with national policy references, NTCOGSO acknowledges concerns raised by clinicians, allied health professionals and parent advocates about the term's framing.

Many students disengage from school as a protective response to unresolved bullying, anxiety or unmet support needs. We encourage future policy development to consider more inclusive language that reflects the complexity of student withdrawal.

A review of language use, guided by expert advice, would help reflect current best practice in youth mental health promotion and strengths-based education.

Recommendation 14: That the development of National Standards includes careful consideration of the language used to describe bullying, with a focus on terminology that is strengths-based and meaningful to young people.

Summary of key recommendations

1. That the National Standards establish rights-based and culturally responsive expectations to guide jurisdictional policy and practice.
2. Expand the national definition of bullying to include culturally distinct terminology and understanding.
3. That the National Standards prioritise the needs of students with disability.
4. That the National Standards explicitly acknowledge the link between bullying and school refusal.
5. Australian government set a minimum engagement standard for future national consultations.
6. Establish clear and consistent responsibilities for schools through the National Standards to identify, prevent and respond to bullying as a serious psychosocial hazard.
7. Address relational aggression in school communities.
8. Establish National Standards for the functional design of schools and playgrounds. Capital funding support for jurisdictions with a lack of own-source revenue.
9. Develop nationally consistent and culturally appropriate resources for families.
10. Integrate comprehensive trauma-informed modules in Initial Teacher Education (ITE) programs.
11. Conduct a national scan of evidence-based anti-bullying models, including those implemented in remote or high-needs communities.
12. Include school-based mental health practitioners as a core element of the National Standards, with minimum staffing ratios and locally approved alternative models for remote communities.
13. Commit to sustainable Commonwealth investment through tied funding, with specific consideration for the Northern Territory's unique delivery challenges and lack of own-source revenue.
14. Use strengths-based and student-relevant language in the National Standards.

References

- ¹ Monash University 2023, *Student Wellbeing Study*, Monash Centre for Health Research and Implementation, Melbourne.
- ² Orygen 2023, *Missing in Action: School Refusal in Australian Adolescents*, Centre for Youth Mental Health, University of Melbourne.
- ³ Disability Royal Commission 2023, Final Report, *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*, Australian Government.
- ⁴ Parliament of Australia 2023, *Senate Inquiry into School Refusal and Related Matters*, Senate Education and Employment References Committee, Commonwealth of Australia.

For more information, please contact:

Michelle Parker

Executive Officer

NT Council of Government School Organisations (NTCOGSO)

executive.officer@ntcogso.org.au