

# Queensland Government Submission

*to the Productivity Commission Draft Report on the  
National Education Evidence Base*

## 1. Introduction

- 1.1 The Queensland Government is committed to an early years and school education system of the highest quality, in which policy settings and practices are informed by the best available evidence.

## 2. Queensland's commitment to education data and research

- 2.1 In Queensland, quality evidence matters. Consistent with broader Queensland Government agendas, the Queensland Department of Education and Training has adopted a comprehensive and future-focused approach to the identification, collection and application of education-related data and research.
- 2.2 This approach is designed to facilitate continuous improvement, while recognising differences in the state's roles and responsibilities with respect to early childhood development, education and care, and school education.
- 2.3 The Queensland Government's commitment to early years and school education data and research is demonstrated by:
- an annual research plan and priorities which ensure research activities and investments are aligned to Queensland's early years and school education priorities;
  - *Education Horizon* grant scheme, which offers annual grants for quality research proposals aligned with early childhood education and care, school education and training research priorities;
  - development of a research database, which will house and disseminate education-related research and evaluation activity approved and/or commissioned by the Queensland Department of Education and Training;
  - an *Evidence Framework*, which supports the generation of quality evidence and improves the rigour with which we examine evidence;
  - *Standards of Evidence*, which provide a consistent way of considering the quality of research and evidence for educators and developers of education programs and policies;

- an *Evidence Hub*, which uses the *Standards of Evidence* to share best practice and research about school improvement and translate research into practical resources for teachers;
- *Headline Indicators*, which are a key element of the Queensland State Schools Performance Assessment Framework and provide a snapshot of school performance data twice a year; and
- an *Evaluation Strategy*, which guides how we develop and conduct well-designed, quality evaluations.

2.4 Queensland is using quality data and research to improve outcomes in early childhood development, education and care and in school education, including through:

- independent school reviews, which the Department's School Improvement Unit conducts using school performance data and other relevant information to provide detailed feedback to schools in support of Queensland's school improvement agenda – an annual report analysing findings and trends from school reviews is published to disseminate findings across Queensland's education sector;
- the *Investing for Success* initiative, through which additional Australian Government funding is provided directly and in full to Queensland state schools and school principals to use performance data to identify evidence-based strategies and to plan how this resourcing will be used to maximise student outcomes;
- research translation activities, including face-to-face and online research forums which present findings on topical research to departmental staff, academics and other stakeholders;
- the *Key Performance Indicator Cascade*, which sets out key performance measures for schools and early years services providers, regions and the Department of Education and Training;
- a range of data profiles tailored for schools, regions and senior policy makers to support identification of successful practice and inform decision making at the school and regional level;

- open access for schools to student and school performance data and administrative collections through the Open Data portal, School Data hub and Training Data hub;
- a suite of resources developed in partnership with Early Childhood Australia, to support early childhood education and care (ECEC) services to understand their Australian Early Development Census (AEDC) data and how it can be used to: inform curriculum programming and planning; support quality improvement; support children's successful transition to school; and act as a platform to form collaborative community partnerships;
- the *Results Based Accountability Framework* for early years services, which provides a simple means of measuring improvements in outcomes for children and their families; and
- the work of Master teachers in Queensland state schools, who develop evidence-based strategies for literacy and numeracy improvement and capability development through action research.

### **3. Response to Productivity Commission Findings and Recommendations**

3.1 The sections below provide the Queensland Government's position on key findings, recommendations and requests for further information from the Productivity Commission, focusing on:

- the framework for furthering the national education evidence base (chapters 1 and 2);
- gaps in education data and evidence (chapter 3);
- data collection, processing and access (chapters 4, 5 and 6); and
- the case for a national effort including research priorities, governance and institutional arrangements (chapters 7 and 8).

#### **Framework for furthering the national education evidence base**

3.2 Overall, Queensland agrees there is a rationale for improving the national education evidence base, using both the top-down and bottom-up approaches outlined in the draft report and focusing strongly on the application of data and translation of research to inform good practice.

- 3.3 However, Queensland challenges the finding in relation to the impact of increases in expenditure (Draft Finding 1.1) and suggests additional principles for guiding further development of a national education evidence base (Draft Recommendation 2.1).

*Impact of Funding*

- 3.4 The Draft Report's finding that increased expenditure on education has not delivered significant improvement at the national level (Draft Finding 1.1) is misleading. It fails to recognise the substantial efforts that teachers and schools make every day in pursuit of improving learning outcomes.
- 3.5 PISA testing measures 15-year-old school pupils' scholastic performance. The 2012 PISA results cited in the draft report (which pertain to mathematics only) relate to students who have already exited the school system. It will be some time before current reforms, which include changes to the curriculum, a greater focus on teacher quality and a focus on early intervention, are reflected in the PISA data. It is therefore premature to claim that increases in funding have made no difference.
- 3.6 In fact, Queensland's best-ever performance on national assessments in 2016 has been enabled by the increased funding available to schools to support the use of evidence-based approaches to improving performance.
- 3.7 Through targeted investments informed by the best available evidence, Queensland has made policy and operational decisions that have resulted in significant improvements in its early years and school education sectors, for example:
- kindergarten participation in Queensland increased from 29% in 2008 to 100% in 2015;
  - 2016 NAPLAN results confirm Queensland's long-term trend of lifting literacy and numeracy outcomes – in 2016, Queensland students had their best performance ever in 12 of 20 test areas and have shown improvements in 18 of 20 test areas since testing began;
  - since 2008, Queensland's NAPLAN results across the board have improved significantly – as exemplified in Year 3 reading performance, where we have consistently seen increasing distributions of students in the higher bands each

year, across the spectrum, including for Indigenous students (see Attachment 1);  
and

- almost 95 per cent of Queensland's Aboriginal and Torres Strait Islander students achieved Year 12 certification in 2015, compared with almost 97 per cent for non-Indigenous students, demonstrating a closing of the gap between Indigenous and non-Indigenous students.

3.8 From a schooling perspective, it has been Queensland's experience that resourcing makes the most difference when it is paired with:

- evidence – data analysis must inform school improvement, with resourcing directed to strategies that maximise improvement in learning outcomes;
- empowerment – principals and teachers need to be able to make decisions and implement strategies that the evidence indicates will work for their school; and
- accountability – principals, teachers and schools need independent feedback focused on helping them to analyse performance and outcomes, and school communities must be engaged in the school improvement process.

*Principles for guiding the further development of a national education evidence base*

3.9 Queensland agrees that further development of a national evidence base should be guided by a set of nationally agreed principles, with a strong focus on quality enhancement, well-being, learning outcomes and school improvement.

3.10 The four principles set out in the Draft Report represent a good starting point for discussion (Draft Recommendation 2.1). However, Queensland also believes that:

- a national evidence base should focus on evidence that has national relevance and applicability (i.e. that informs decision-making by Education Council and First Ministers);
- a national evidence base should provide for national analysis which supports consistency of interpretation;
- data and research projects at the national level must not duplicate the considerable data and research gathered to support local and state level decision-making, resource allocation and interventions;

- the national evidence base must not place an unnecessary impost on schools and early years services, noting that:
  - the cost burden of national data collection falls largely on states;
  - the cost of effort to implement national data collections falls largely on schools and ECEC providers, while the benefit is not necessarily distributed in a way that justifies this burden; and
  - some non-education related research is undertaken in early years services and schools for ease of access to relevant cohorts, when it could be better undertaken outside these environments to limit the impact on teaching and learning.
- the protection of the right to privacy, and protection and well-being of children and students, are paramount;
- data and research generation should not be undertaken in a manner that leads to inappropriate use; and
- the approach to maintaining, building and applying the national evidence base should be as efficient as possible:
  - avoiding unnecessary duplication;
  - focusing in the first instance on improving and/or more effectively utilising existing data collections (including through data linkage); and
  - using or modifying existing national architecture.

#### **Gaps in education data and evidence**

- 3.11 Acknowledging there may be gaps in information, Queensland supports government examination of the need, feasibility, alternate options and cost benefits in assessing whether improvements or adjustments to existing data collections are required (Draft Recommendation 3.1). This consideration should include what steps can be taken to reduce the impost of data collection or research on respondents, schools, early years services, schooling systems and states (in line with Draft Recommendation 4.1).
- 3.12 Queensland notes Draft Finding 3.1 and the work that is currently underway to build on existing education data sets subject to discussion and approval at Education Council (e.g. the National Teacher Workforce Dataset).

- 3.13 Given the significant policy reforms, economic and social changes that have occurred since the commencement of the Longitudinal Study of Australian Children and Longitudinal Study of Indigenous Children, particularly in the early childhood sector, there is value in the Australian Government funding the establishment of new cohorts (Draft Recommendation 3.2). The use of rigorous sampling methodology will be required to ensure new cohorts are representative of the diverse early years and schooling contexts across Australia.
- 3.14 While appreciating the need for early intervention, Queensland is concerned about the proposed national Year 1 assessment, particularly if this means the introduction of a new nationally standardised assessment program in Year 1, similar to NAPLAN assessment in Years 3, 5, 7, and 9. The benefit to schools and students of a national Year 1 assessment is unclear and any national assessment has the potential to duplicate existing local and state based early intervention assessments and strategies.
- 3.15 A formal testing environment is not the preferred approach for assessing educational outcomes in the early years of schooling and may have impacts on student wellbeing and teaching practices. Costs of national roll-out, communications and training, and impost on schools of a new national standardised testing program, should not be underestimated.
- 3.16 Queensland schools are already able to access a fit-for-purpose literacy and numeracy assessment program in the early primary years through the Early Start initiative, available free of charge to state schools. This promotes a culture of ongoing and consistent school-based monitoring for students in Prep to Year 2.
- 3.17 Queensland supports greater use of value-added measures of education outcomes (Draft Recommendation 3.3), which take into account student achievement over time and external influences on student learning. It is noted that value-added measures provide an additional data source to support further research into what works to improve education outcomes. However, given the significant challenges involved in defining and assessing valued-added measures, Queensland is of the view that there are other gaps in the evidence base that should be accorded a higher level of priority for investment.



*Information request 3.1: Australian Early Development Census (AEDC)*

The AEDC is an existing measure that could be better utilised to monitor early learning outcomes nationally, by mapping the five domains of early childhood development captured by the AEDC to the Early Years Learning Framework outcomes.

If the AEDC were to be used for this purpose, consideration would need to be given to: the broader influences on early childhood development, including family influences; that not all children for whom the AEDC is collected attended an early childhood education and care program; and the fact that teachers complete the AEDC based on skills and competencies required for school, which may not reflect the desired outcomes at the end of the preschool year.

**Data collection, processing, access and linkage**

- 3.18 Education departments collect a considerable amount of data required to meet reporting requirements through various National Agreements, National Partnership Agreements and Project Agreements. This presents challenges in the form of respondent burden on schools, parents, sectors and providers, and flow on impacts on the ability of schools and ECEC providers to focus efforts on their core business of education and care, and teaching and learning. Where possible, this cost and administrative burden is absorbed at a central level.
- 3.19 Queensland supports Draft Recommendation 4.1 that consideration should be given to reducing administrative cost and compliance burden, including removing duplication and avoiding frequent changes to reporting requirements where possible.

*Data access*

- 3.20 Queensland notes Draft Finding 5.1 that while considerable data is collected, impediments exist to its access and use. However, the draft report appears to lack balance in its consideration of the arguments for and against greater access to student data containing personal information, with a greater weight given to ease of access to data for researchers than the potential risks to privacy and data security.
- 3.21 Queensland is supportive of further work to clearly identify barriers to data sharing and investigate options for overcoming them, where it can be demonstrated it will

improve research capacity and quality, and subject to appropriate legislative and policy safeguards that ensure data security and individual privacy.

- 3.22 To reduce burden on researchers conducting research across multiple jurisdictions, Queensland is currently participating in the pilot of a National Application Form to conduct research in schools in more than one state or territory. Under the pilot, researchers wishing to undertake research in more than one state or territory complete a single national application form and apply to each jurisdiction. Applications are assessed by each jurisdiction according to their individual research approval guidelines.
- 3.23 Queensland is concerned that Draft Recommendation 5.1 is not viable in practice, as it is unclear how the proposal to include formal consent and notification procedures at the initial point of collection would be implemented. The Office of the Information Commission Queensland Guidelines – Privacy Principles clearly state that for consent to be valid it must be voluntary, informed, specific and current. It is unclear how valid consent – that is intended to be ongoing – to disclose students’ personal information at the time of enrolment would be obtained when the research project and research entity are not yet known.
- 3.24 Draft Recommendation 5.4 proposes that state and territory governments pursue legislative consistency in the use and disclosure of education information so that it is aligned with the intent of general privacy laws. Queensland draws attention to its *Education (General Provisions) Act 2006* (EGPA), which is the primary legislation governing the recording, use and disclosure of state school students’ personal information by Queensland Department of Education and Training employees. The provisions in the EGPA permit the chief executive of the Department to disclose student personal information for research in the public interest (s426 (4)), and provides an appropriate way to respond to research requests.
- 3.25 Early childhood services are governed by the *Education and Care Services National Law Act 2010* (National Law) which is implemented in Queensland under a nationally applied law scheme, thereby creating legislative consistency across Australia. The National Law allows the Queensland Regulatory Authority to disclose information in respect of ECEC services to the Australian Children’s Education and Care Quality Authority (ACECQA), a Regulatory Authority of a participating jurisdiction, and the

relevant Commonwealth Department for the purposes of research and the development of national policy with respect to ECEC services. The provisions in the National Law provide parameters about what information can be shared.

- 3.26 Queensland has significant concerns about Draft Recommendation 5.5 which proposes to place the onus on data custodians to share data unless a privacy exception can be justified. This proposal is contrary to the onus established in existing privacy and confidentiality protections not to share personal information unless a permitted exception applies.
- 3.27 Queensland notes Draft Finding 6.1 that data linkage could be improved if linked data were retained by the linking authority. This would require clear governance around how the linking authority could use the data, with data custodians retaining ownership and control over storage, access and any proposed sharing of data provided to linking authorities.

*Information request 4.1: Unique Student Identifier (USI)*

Queensland suggests further work is required to clearly articulate the costs and benefits for children, students, early years services, schools, systems and researchers of a unique student identifier. While there are benefits to being able to more easily monitor students across jurisdictions and sectors via a USI, the costs associated with implementation of a USI should not be underestimated.

- 3.28 Queensland supports in principle Draft Recommendation 7.1 that an online metadata repository for education data collections be created. However, further explication of the costs, benefits and intended use of the repository is required, as it may purely drive an increase in the quantity of research rather than its effective application.

**National effort including research priorities, governance and institutional arrangements**

- 3.29 Overall, Queensland agrees that priorities should be set for national investment in research. Within this context there should be a strong focus on pursuing high quality research for nationally applicable purposes, and the translation of research to inform good decision-making and improved practice.
- 3.30 There is a substantial national investment in education research, at a total of \$470 million in 2014 (ABS 2014b, 2015c, 2016d)<sup>1</sup>. However, in addition to the gaps in the national evidence base discussed earlier in this submission, the draft report also points to gaps in the quality of research undertaken, and in the use of research to inform decision making. The draft report presents evidence that suggests research is not being used – in part – because it lacks relevance or is not of sufficient quality.
- 3.31 Queensland supports Draft Recommendation 7.2, that Australian governments should pursue a national policy effort to develop a high quality and relevant Australian evidence base about what works, to support decision making at a national level. Queensland also sees benefit in adopting rigorous quality control processes for nationally funded research.
- 3.32 However, significant care needs to be taken in assuming that a national policy effort will deliver evidence that meets the full range of needs of the audiences included in the draft report, or that it will be sufficient to drive the desired improvement in performance.
- 3.33 The draft report points out the limitations of international research – which may be dated or not directly translatable to the Australian context<sup>2</sup>. Queensland notes that the same limitations, in particular in terms of its applicability in different jurisdictions and communities, apply to research conducted for national policy purposes.
- 3.34 Queensland does not support Draft Recommendation 8.1 to use a new National Education Agreement (covering both early childhood education and care and school education) to support development of a national policy effort to improve the national evidence base.

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<sup>1</sup> Productivity Commission Draft Report, National Education Evidence Base, p. 168

<sup>2</sup> Productivity Commission Draft Report, National Education Evidence Base, p. 96

- 3.35 The National Education Agreement has a broader remit than data and research activities and is not the only available mechanism to progress a national research policy effort. Combining both early childhood education and care, and school education, in a single agreement would have a range of consequences that are beyond the scope of this inquiry.
- 3.36 Queensland would prefer to use existing mechanisms (subject to consideration and agreement by all jurisdictions), such as expanding the scope of National Information Agreements to include research.
- 3.37 Further, Queensland would not support any proposal to assign a new institution with responsibility to implement a national policy effort on data and research (a potential outcome under Draft Recommendation 8.1), which would be a costly endeavour and add to the already significant national architecture.
- 3.38 Queensland is of the view that the existing national architecture should be used to progress agreed work to advance the national education evidence base. Through the Council of Australian Governments (COAG), the Education Council already has responsibility for national collaborative action to improve education outcomes, including collaboration to develop a research plan and improve the evidence base to inform policy development, and (as noted in the draft report) a number of existing entities already have related functions.

#### **4. Concluding Remarks**

- 4.1 Queensland supports efforts that will improve the national education evidence base, using both the top-down and bottom-up approaches outlined in the draft report.
- 4.2 Queensland's improved performance demonstrates that increased resourcing makes a difference to education outcomes. It is the additional resources provided in recent years which have enabled Principals and schools to use evidence-based approaches to creating learning environments that meet the needs of every student. In our schools there is real innovation and excellence occurring every day, supported by government investment in delivering better outcomes for young Queenslanders.
- 4.3 Bottom-up evidence about what works, where and for whom, is a critical enabler to driving student and early childhood improvements. However, careful consideration

of the delineation of data collection and research activities at the local, state and national level is required. Data and research projects at the national level should complement – not replace or duplicate – the considerable data and evidence gathered to directly support local and state level decision-making, resource allocation and interventions.

- 4.4 A key element of the scope of the Productivity Commission’s inquiry is to consider the costs and benefits of the options for improvements to the national education evidence base. Queensland is keen to see further advice from the Productivity Commission incorporate a more fulsome analysis of the costs and benefits in relation to early years and school education policy making and service delivery.

Attachment 1

# Queensland NAPLAN Year 3 Reading

