

Productivity Commission Issues Paper: National Education Evidence Base

Submission by

The Independent Schools Council of Australia (ISCA)

Introduction: About the Independent sector

The Independent Schools Council of Australia (ISCA) is the peak national body representing the Independent school sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISCA represents a sector with 1,091 schools and just over 586,800 students, accounting for nearly 16 per cent of Australian school enrolments.

Independent schools are a diverse group of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Others promote a particular educational philosophy or interpretation of mainstream education.

Independent schools include:

- Schools affiliated with larger and smaller Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Seventh Day Adventist and Presbyterian schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as grammar schools in some states
- Community schools
- Indigenous community schools
- Schools that specialise in meeting the needs of students with disabilities
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other risk factors.

Independent schools are not-for-profit institutions founded by religious or other groups in the community and are registered with the relevant state or territory education authority. Most Independent schools are set up and governed independently on an individual school basis.

However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example the Lutheran system. Systemic schools account for 18 per cent of schools in the Independent sector. Independent Catholic schools are a significant part of the sector, accounting for 8 per cent of the Independent sector's enrolments.

Role of ISCA and the AISs

The Independent Schools Council of Australia (ISCA) represents the interests of the Independent school sector at the Commonwealth level. ISCA advocates on behalf of Independent schools through representation on national committees, consultations with national bodies and Commonwealth departments on a range of policy areas. It does not have a direct relationship with Independent schools and does not collect any data directly from Independent schools. ISCA has access to national data sets as the national peak body for Independent schools. ISCA utilises these data to provide factual information on the sector to Independent schools and to the wider community and to provide evidence-based support for its advocacy on behalf of the sector.

The Associations of Independent Schools (AISs) in each state and territory directly represent and support Independent schools in their jurisdiction. Independent schools receive support from the AISs for all aspects of school operations and in the development of policies and programs related to national and jurisdictional requirements. AISs generally do not collect data from their schools however there have been instances where national programs, such as targeted programs and other Commonwealth initiatives, have required the AISs to collect quantitative and/or qualitative information for the purposes of program development and evaluation. Indeed some AISs may also be expected or required to help facilitate the collection of school information for the purposes of national and jurisdictional collections.

ISCA strongly recommends the Commission seeks further detail around these instances and the impact of state and territory collection requirements on both schools and AISs from the Associations of Independent Schools directly.

Data Collections

Independent schools have extensive Commonwealth legislative accountability requirements under the Australian Education Act 2013¹ to provide information through national data collections and through participation in National Assessment Program testing.

Non-government schools, including Independent schools, are required to provide information through an annual census of non-government schools which collects information about schools, staff and students. This information is provided to Australian Government Department of Education and Training (AG DET) through a portal hosted on the department's website. The AG DET also collects financial information annually from Independent schools through a Financial Questionnaire and student attendance data biannually, via the online portal.

The AG DET facilitates the collection of this information and in turn provides aggregated school level data to the Australian Curriculum and Assessment and Reporting Authority (ACARA)² for publication on the *My School* website and in the *National Report on Schooling in Australia*, and to the Australian Bureau of Statistics (ABS) for the purposes of the *National Schools Statistics Collection* (NSSC) for the annual *Schools Australia*³ publication.

Independent schools provide performance data through participation in the annual National Assessment Program - Literacy and Numeracy (NAPLAN) for Years 3, 5, 7 and 9, and the national

¹ Australian Education Regulation 2013, <https://www.legislation.gov.au/Details/F2013L01476>

² <http://www.acara.edu.au/reporting/reporting.html>

³ <http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4221.0Explanatory%20Notes12015?OpenDocument>

assessment program which includes sample testing in a number of identified key areas as specified by the Education Council⁴ on a rolling timetable. This also includes participation in the Programme for International Student Assessment (PISA)⁵, a triennial international sample assessment which evaluates education systems worldwide.

Through the annual NAPLAN program, in addition to performance data, student background information is also provided from those students participating in the test via the Test Administration Authorities (TAAs) in each state and territory to ACARA. Student background information is collected from parents at the time of enrolment and includes the student's gender, indigeneity and parental background information, including the educational and occupational information of the student's parents/carers.

This information, together with the school's geographical location, forms the basis of the *Index of Community and Social Educational Advantage (ICSEA)*⁶ which is reported on *My School*. In turn the Social Educational Advantage (SEA) component of the Index is used to identify the SEA quartiles for each school to determine the Low SES loading component of a school's funding entitlement. Parental background data also informs the English Language Proficiency (ELP) loading through the use of a proxy calculated by ACARA – Disadvantaged LBOTE. These data are extremely high stakes given the potential impact on a school's ability to access government funding. Concerns with this particular data collection will be outlined further in this submission.

Since 2013, Australian schools have been progressively participating in the Nationally Consistent Collection of Data on Student with Disability (NCCD). 2015 was the first year that all schools participated in the collection. This collection is an intensive exercise for schools as it is based on the teacher judgement of the level of adjustment provided to each student with disability within a school based on the definition of disability in the Disability Discrimination Act 1992⁷ (DDA). For Independent schools this data is submitted to the AG DET by individual schools via its online portal except in Victoria where schools submit their data to Independent Schools Victoria (ISV), who then pass the data onto AG DET.

There are other national collections and surveys as indicated in Table 1 of the National Education Evidence Base Issues Paper that may involve Independent schools as they are either sample surveys or voluntary collections. Most Independent schools participate in the Australian Early Development Census (AEDC) every three years in addition to jurisdictional annual early years' assessment.

Many Independent schools are now providing childcare and Early Childhood services for their school communities. A growing number of schools across Australia provide Early Childhood education for 4 year olds and are in receipt of funding provided through the National Partnership on Universal Access to Early Childhood Education⁸. The annual National Early Childhood Education and Care Collection, the primary data source for the measurement of achievement of benchmarks and monitoring of progress under the National Partnership, is collected by jurisdictions to describe progress against agreed targets. The participation in the ABS National Early Childhood Education

⁴ <http://scseec.edu.au/>

⁵ <http://www.oecd.org/pisa/aboutpisa/>

⁶ http://www.acara.edu.au/verve/_resources/About_ICSEA_2014.pdf

⁷ <https://www.legislation.gov.au/Details/C2015C00252>

⁸ http://www.federalfinancialrelations.gov.au/content/npa/education/universal_access/UAECE_2016_2017.pdf

and Care Collection (NECECC) via state and territory early childhood collections is determined by the inclusivity of non-government providers in jurisdictional collections.

Teacher workforce data is also collected at the state and territory level for registration purposes and these data may be provided to national collections depending on legislative and privacy issues.

In addition to the national requirements, as mentioned previously, schools have state and territory requirements related to registration compliance in terms of reporting performance and financial data and any specific program/policy data as identified by the state or territory's Minister of Education. Many jurisdictions also have their own school census which is separate to the Commonwealth Non-government School Census. As mentioned previously, the requirements and the level of reporting vary between jurisdictions and therefore seeking input from AISs would be highly recommended.

Addressing specific areas within the scope of the inquiry

1. Existing or potential barriers to the sharing of education (and other relevant) data.

As described in the introduction of this submission, the Independent school sector is unique in the diverse and non-systemic nature of the majority of schools. Independent schools are located in all regions of Australia with 29% located in provincial areas and 3% in remote areas. In terms of size, 38% of schools have less than 200 students with 11% of these with less than 50 students. Only 17% of schools have over 1000 students with the remaining schools having 200 – 999 students. Many Independent schools (66%) are combined schools catering for students from K (Year 1 minus 1) to Year 12.

Unlike other sectors, most Independent schools operate autonomously. They do not rely on central bureaucracies or system authorities and are individually accountable to their parent and school communities. This means that data requests are made directly to the schools themselves and that schools are often required to provide the requested data regardless of what internal resources they have in place.

There is great variance across Independent schools in terms of how they manage the collection of data for national and jurisdictional purposes. Larger schools often have sophisticated software packages and clearly defined processes with dedicated administrative staff able to collate data. For other schools it may be the responsibility of the office bursar or even for small schools, the school Principal, to ensure relevant data are collected and submitted. The lack of centralised processes for Independent schools to collect and collate data can make data collection in the Independent sector challenging. Unlike Catholic systemic schools, there are no system authorities to either co-ordinate collections or even provide the data themselves from centralised administration services. Instead, there are differing methodologies, many types of software used and staff resourcing applied across the sector. This makes it extremely difficult for some schools to make changes to their processes or to add new collections without significant extra effort and cost burden at the school level.

Another major issue for the Independent sector are concerns about privacy. Independent schools provide data on behalf of their students with parental permission provided on enrolment. The general statement on enrolment forms mentions that 'information may be collected for education purposes' or 'to meet state and national reporting requirements' or other words to this effect. It is unclear whether there is an understanding by parents of what information is collected, how it is

used and by whom, given that at the time of enrolment parents are probably entirely unaware of what information may be collected. Given consent is provided at enrolment, it is assumed that this consent lasts the duration of the student's enrolment at that school. ISCA believes that parents need more information about what is being provided and the potential uses of the data, particularly in high-stakes policy areas such as school funding, how long the data will be stored and whether the data will be linked to other data collections.

As identified in the Issues Paper, in addition to the privacy legislation at the Australian Government level, six of the eight states and territories have their own privacy legislation which adds significant complexity in terms of provision of information to third parties without the express consent of parents or guardians. Inconsistency in the application of obtaining consent during the collection phase across jurisdictions has hampered efforts to provide information to agencies to build national datasets.

In terms of student and parental background information, anecdotally it appears that parents are becoming more data aware and are beginning to limit the provision of information to schools, focussing more on providing emergency contact information and the bare minimum requirements. Schools are unable to compel parents to complete enrolment forms or change information either due to misinterpretation of enrolment forms or the provision of incorrect data. Further, the potential uses of student and parental background data are often unclear.

Privacy statements on enrolment forms do not clearly articulate that this data will be used to calculate funding loadings for individual schools. In 2012 when the current Commonwealth funding model was being developed, ISCA wrote to the Office of the Australian Information Commissioner (OAIC) noting our concerns with the proposed use of data collected from parents for purposes other than for which it had been collected. ISCA made the following observations.

Data now held by ACARA includes information on the sex, indigenous status, main language spoken at home and country of birth of students and parental education and parental occupation. While much of the data currently held by ACARA is at school-level, increasingly data is being collected at the unit record level.

Of particular concern to ISCA is that much of the data provided to ACARA for the purposes of reporting on school performance is now being used for other purposes, including as the basis of funding arrangements proposed by the recent Review of Funding for Schooling.

These data are collected by schools from parents at the time their children are enrolled. The evolving uses of data could not have been anticipated at the time they were collected from parents, so parents have not been made aware of the change in usage, or the increasingly broad range of end recipients.

State and territory governance structures can also impact on national collections where jurisdictions may use differing definitions and inclusions/exclusions in their collections. The ABS National Early Childhood, Education and Care Collection (NECECC)⁹ uses state and territory early childhood collections as one source of data. For some jurisdictions, NSW and SA for example, Preschool services not funded by the state or territory government may not be included or invited

⁹<http://www.abs.gov.au/AUSSTATS/abs@.nsf/Latestproducts/4240.0Appendix32015?opendocument&tabname=Notes&prodno=4240.0&issue=2015&num=&view=>

to participate in the collection. Where preschool services are provided by a Long Day Care provider and are not government funded, these may also not be captured by a jurisdiction collection but may be captured in the Australian Government's Child Care Management System if the service is registered for a childcare service. Therefore for Independent schools with a variety of early childhood service models used across the country, preschool programs may be captured differently or not at all, depending on whether they are government funded, what type of service they identify as or what jurisdiction they are registered in.

There is also a tendency to focus on schools as the only possible sources of data relating to students, schools and teachers and other staff. Work progressing on the National Initial Teacher Education and Teacher Workforce Data Strategy being developed by the Australian Institute for Teaching and School Leadership (AITSL) is looking to initially utilise data in existing data collections. This approach does not add to the burden on schools and it is hoped that any requests for further data items from employers, i.e. schools, will be thoroughly weighed against the added reporting burden for individual schools.

2. Factors that inhibit access to, and consistency of, relevant education data to support analysis and evidence policy development

Collection and use of data

The understanding by which data are collected and the purposes for which they are used is a significant area of concern for the Independent sector.

As noted above, there are on-going concerns around the use of background data provided by parents at the time of enrolment and how this data is in turn used for funding calculations. The issue of accurately capturing student and parental background data at enrolment and whether this information is rigorous or complete is a serious concern given the now high-stakes use of this information. The most concerning example being for the calculation by ACARA of the Socio-Educational Advantage quartiles which are then used to calculate the Low SES loading component of the current Commonwealth funding model.

In 2010, the ABS investigated a summary of cross-jurisdictional comparisons of the quality and methods for collecting and storing data on parent/carer occupation, school education and non-school education qualifications. A number of issues were raised in relation to quality improvement and comparability in a paper presented to the Productivity Commission's School Education Working Group.

It was found that enrolment forms varied across jurisdictions and sectors and therefore parental consent and level of non-disclosure in line with privacy legislation may not have been adequately addressed. The parental perception of privacy determined their level of comfort in providing some data items and given that school office staff were responsible for entering the enrolment data into the database this was likely to introduce bias into the results as some respondents may be reluctant to disclose their true socio-economic status to school staff. The ABS also identified lower proportions of parents with lower levels of occupation and education compared with the Census which implied that there was a high non-disclosure rate for these items or that parents/carers were overstating their occupation and education levels on their enrolment forms.

In the Independent sector there is a concern that parents/carers are either reluctant to provide specific items in relation to education and occupation or overstate these items in order to appear a suitable and reliable candidate for the school community and the payment of school fees. In smaller regional areas in close-knit communities, parents/carers may not wish to divulge such personal information particularly when school office staff may know parents/carers personally.

This is also challenging for schools with significant numbers of students new to Australia from migrant and refugee backgrounds. Parent backgrounds are complex, e.g. with some parents having post school and higher education qualifications that are not recognised in Australia, or where they cannot find employment in these areas and take on unskilled positions as an alternative.

In fact, some Independent schools will never have complete datasets because of the difficulty in collecting accurate student and parent/carer background information for some cohorts of students. This has been particularly evident in remote Indigenous community schools where there are significant challenges in obtaining complete and accurate background data from parents. In some cases students may not actually have a relative in the community who is able to complete the information.

The inconsistent provision and accuracy of parental background data from Indigenous community schools in particular, has led to quite extreme swings in ICSEA scores year-on-year for some schools. While to some degree missing data can be compensated for using imputation methodologies, this is not necessarily the case where the data missing is that of an entire cohort.

Given the importance of this administrative data and the impacts on the calculation of ICSEA and SEA quartiles it is a concern for the Independent sector how these limited data, and possibly imputed data, can accurately reflect a school's community and therefore their funding entitlement.

The original purpose for the calculation of ICSEA was for publication on My School to allow users to compare schools that had similar student populations and NAPLAN results, and not intended to be for calculating Low SES funding entitlements. There are significant questions, particularly in the Independent sector around the whether the parental background data used to calculate the SEA quartiles is fit for the purpose of calculating funding entitlements and whether their use was instead driven solely by expediency and timing pressures.

The proxy measure for low English language proficiency has been demonstrated, through a study undertaken by a large government education authority, to be identifying the wrong cohort of students, as well as significantly under-identifying the low English language proficiency students most in need of support.

Privacy

As noted earlier in this submission, there are complex privacy arrangements in place across different levels of government and in the schools sector significant work still needs to be done to address these issues to facilitate information sharing, in a manner similar to the health sector.

The inconsistent privacy arrangements across jurisdictions were particularly problematic for the Nationally Consistent Collection of Data on Student with Disability (NCCD). In order to address the differing privacy and health legislation across states and territories which resulting in differing consent arrangements across the jurisdictions, the Commonwealth amended the Australian

Education Regulation 2013¹⁰ in late 2014 to enable this data to be collected and reported without explicit consent from parents.

The Data Strategy Group (DSG), formed under the Australian Education Senior Officials Committee (AESOC), is currently progressing work on a National Information Agreement for schooling. This should go some way to addressing some of the existing barriers to data sharing, however the role and capacity of the Independent sector to participate in such an agreement is unclear.

These issues have also arisen in the context of moving to NAPLAN testing online and how the performance of students can be tracked over time and across sectors. State and territory jurisdictions are currently able to track students within their own jurisdictions however no such facility exists currently to enable individual tracking either between states and territories or across sectors.

In such contexts, the governance of data holding becomes extremely important and is an area in which further development is required.

Stakeholder engagement and / or consultation

One of the key issues for the Independent sector in terms of the creation of consistent data holdings across all sectors of schooling is that of engagement, consultation and implementation.

As noted earlier, Independent schools often have limited resources when it comes to data collection and resourcing. The state and territory Associations of Independent Schools (AISs) are also limited by financial constraints in terms of the support they are able to offer at a sector level.

In some cases the AISs do not know the data detail that is provided directly to jurisdictions. In SA, for example, the quarterly Universal Access Early Childhood census data is provided to the Department for Education and Child Development directly and bypasses the Association of Independent Schools of South Australia altogether.

In order to achieve sectoral 'buy-in' to new data collections, it is imperative that the Independent sector is adequately engaged and consulted around the purpose of any new data to be collected; the means by which the data is to be collected and the use of realistic timelines for the introduction of any new collections.

An example where stakeholder consultation has successfully streamlined levels of reporting has been with the reporting requirements for the Australian Charities and Not-for-profits Commission (ACNC). The current financial reporting exemption and utilisation of Financial Questionnaire data to fulfil schools' reporting obligations has resulted in a lessened burden on non-government schools. On-going consultations between the ACNC, the Department of Education and Training and the non-government sector aim to reduce duplication of reporting and lessen the administrative burden on schools long term.

3. The role of technology and mobile devices can play on the scope, quality and timeliness of data collection and reporting.

The use of technology at the school level is largely determined by the level of internet access

¹⁰ <https://www.legislation.gov.au/Details/F2013L01476/Html/Text>

(connection and bandwidth), appropriate IT hardware and infrastructure within the school and the availability of trained staff.

Independent schools in regional and remote areas are limited in terms of available internet service providers and often access can prove to be a costly item in a school budget. Access to satellite ground stations as part of the National Broadband Network will take time to provide extensive cover across the country. The impact of costs to communities to access this service is still unknown.

As noted earlier, many schools use commercial administrative software and systems which can be used to meet some of the reporting and accountability requirements of schools. It has been noted that where enough lead time is provided to vendors of such software, alterations can be made to accommodate changes in data collections, such as student attendance, at relatively low cost to schools. However, where there is insufficient lead time, schools will either be unable to use software that incorporates the changes due to time constraints or only at a high cost if a vendor has to make changes extremely quickly. A minimum of twelve months lead time for changes to software systems is preferable.

Limited access and high costs have diminished opportunities for Independent schools to participate in programs such as the Tri-border Strategy where the attendance and mobility of students can be tracked across jurisdictional borders to ensure these students are not 'lost' and can be supported through their education. It also has resulted in time delays for some schools in their ability to submit data for national collections where an upload of data is required.

With the decision to move to NAPLAN online from 2017 there are a number of areas of concern for the Independent sector. In the context of the testing itself, provision has to be made for schools without adequate technological facilities and bandwidth. The current proposal for collecting and housing data through an online data warehouse is also problematic in terms of data ownership, parental understanding of the future uses of data (longitudinal, linkages) and who will be accessing these data collections. Agreements will need to be place to clearly articulate who owns the data and how it is used, stored and disclosed, recognising that agreements will vary according to jurisdictional contexts and ways of working.

Privacy policies will need to ensure that parents understand who controls the access and security of the online data, the retention of data and for how long, and what potential research and linkages may take place. Disclosure statements will need to ensure parents can access this type of information around the time of the tests and provide the nature of the types of information that will be captured.

Stakeholders will also need to be confident that there are appropriate level of security measures in place, that data transfers are secure and that any data breaches are addressed appropriately. This will also result in the added burden on schools to ensure that their administrative systems can be adapted to meet new data requirements, including storage, security and transfer.

4. [The costs and benefits of options for improvements to the national education evidence base.](#)

In any discussion around developing a national education evidence base, ISCA's ongoing primary concern is the level of burden at the school level from any changes to collections or collection processes. It has been mentioned earlier that Independent schools do not receive any centralised

support from bureaucracies or system authorities and that schools resource their data collection requirements differently depending on their size, location, staffing and available resourcing.

There have been examples where high level policy decisions have contributed to changes to data collections that have directly impacted Independent schools. Most recently have been the changes to the Student Attendance Data collection.

In May 2014, the Council of Australian Governments (COAG) agreed to a new target to 'Close the Gap' between Indigenous and non-Indigenous school attendance within five years (by the end of 2018). COAG also agreed that the high level performance indicator to monitor the target would be the overall attendance rates for year 1 to year 10 by indigeneity and remoteness. The Department of the Prime Minister and Cabinet (PM&C) proposed an approach to the measurement of the target and trajectories and in June 2015, the National Indigenous Reform Agreement Performance Information Management Group (NIRAPIMG) endorsed a proposed approach to measuring the new school attendance target and the proposed approach to developing the trajectories.

For these new measures there was a requirement for all schools (not just those schools who enrolled indigenous students) to move from a single annual collection of student attendance data to a twice a year process and to include data to allow the calculation of the proportion of students (Indigenous and non-Indigenous) who attend school 90% or more of the time.

The impact on the Independent sector resulted in the AG DET changing their data collection requirements. Allowing sufficient time for communicating these requirements and for schools to accommodate these changes to existing processes was a significant challenge. Again the non-systemic and diverse nature of the sector impacted on the schools' ability to understand and manage the changes. Independent schools had already been required to make changes to their attendance collection the previous year in moving to a different reporting period to be line with the government sector and meet the *National Standards for School Attendance Data Reporting*¹¹.

In 2014 the DSG began a stocktake of data collections with a view to find areas of overlap or inefficiencies within current collection commitments. The stocktake showed there were around thirty-two different national administrative and survey data collections relating to early childhood development and care and school education. It also showed that despite concerns around duplication, there was in fact not a high degree of duplication in existing national data collections. The identified collections are owned and undertaken by multiple agencies and reported with varying frequency which highlighted possible areas for improvement in terms of governance and communication between agencies.

While there have been some attempts for a national database previously through the ABS Australian Longitudinal Learning Database (ALLD) and a the development of a strategic data framework, Transforming Education and Training Information in Australia (TETIA), both have stalled. This is mainly due to the resource constraints and the general appetite of education stakeholders to invest in complex projects that involve multiple data owners, governance structures, privacy and legislative constraints. However, it is likely that elements of TETIA will be utilised to inform future DSG work around the National Information Agreement.

¹¹ http://www.acara.edu.au/reporting/national_standards_for_student_attendance_data_rep.html

The work towards developing a Unique Student Identifier (USI) has also been prolonged with many complexities around existing identification processes used at the state and territory level, across collections and the appetite to fund any changes when some data custodians/agencies feel that the current system is working well for their own needs. In the Independent school sector there is no single national identification system. Some schools may have a specific cross-sectoral jurisdiction student identification system (e.g. Vic) while many may have multiple IDs depending on the purpose for identification e.g. school ID, NAPLAN ID.

This work is also being progressed by DSG, particularly in relation to NAPLAN online. However the introduction of a USI for school students has the potential to be extremely complex in the Independent sector where there is a subset of schools which face major challenges in terms of changing administrative systems; such as resourcing and staffing constraints. It is clear that any project aimed at introducing a national USI will need to take these constraints into account and assistance would need to be provided for those schools specifically and for the sector generally, in the absence of a centralised or systemic approach such as is available to the government and Catholic sectors.

In Summary

There is value in building a national evidence base for education to assist and inform policy development and evaluation. All education jurisdictions, sectors and schools currently provide significant amounts of data to a range of bodies and data custodians for a range of uses.

In order to build on the existing data collections and create a more comprehensive and useable evidence base, there are a number of issues that need attention and resourcing. One of the core issues is privacy and how to address the concerns of jurisdictions and sectors when dealing with a range of legislative requirements and conflicting requirements.

Resolving these issues will require investment in national data collection and education evidence base in order to ensure that all schools are able to collect and report data on an equal basis without suffering undue impost.

In any ongoing examination of the development of a national education evidence base, it is ISCA's view that the following principles in relation to Independent schools need to always be considered.

- The unique and diverse nature of the Independent school sector coupled with the absence of systemic support from a central bureaucracy or agency, results in the burden from data collection requirements both at the national and jurisdictional level, being placed directly onto schools. It is also critical to recognise that jurisdictional approaches, agreements and requirements vary across Australia, so a seemingly consistent request can impact Independent schools and AISs in different ways.
- High level policy decisions made by government departments and agencies, particularly those outside the education portfolio, requiring data collections from the school sector need to understand and acknowledge the impact at the school level for the Independent school sector. They should consult widely with representative bodies and schools before making final policy decisions.
- Any development towards a national education evidence base should acknowledge jurisdictional and national privacy legislation requirements particularly in regards to parental consent and the

degree to which parents understand what this consent provides. A privacy impact statement should be conducted with any potential new collections or where there are proposed linkages of existing collections.

- Any improvements or changes to data collections should incorporate a cost benefit analysis and include potential impacts at the school level for the Independent sector. Independent schools need clarity about the purpose and benefit of any new proposed educational data collection or reporting to demonstrate that student outcomes would be enhanced through increased measurement.
- Where there are opportunities for testing there is a preference for sample testing rather than full cohort testing as this would be regarded as less invasive and disruptive in schools, acknowledging the existing burden of testing placed on schools in smaller jurisdictions.
- Where agencies make decisions to “collect once and use for multiple purposes” there is a responsibility by the agency to ensure the data is fit for purpose and that there are no high-stakes implications attached to data collections that are not fit for purpose.
- Focus should be on greater co-ordination of data across the range of education levels (Year 1 minus 1 to Year 12) and the reduction of duplication between different levels of government.

ISCA

25 May 2016