



**Australian Government**  
**Department of Education and Training**

**Productivity Commission Inquiry into the  
National Education Evidence Base  
Department of Education and Training  
Post Draft Report Submission**



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## Introduction

As outlined in the Department of Education and Training's ('the Department') first submission to the Productivity Commission Inquiry into the National Education Evidence Base, the Department is committed to improving the education outcomes of young people to lift productivity for all Australians and to enhance the well-being of society. To do this a high performing education system is vital and this needs to be supported by a comprehensive and high quality evidence base to provide the basis for evidence led policy approaches.

In this submission the Department provides further information and clarification on issues raised in the Productivity Commission's draft report dated 6 September 2016. In doing this, the Department has only focused on the specific aspects of the draft Report that it considered would benefit from further development.

## Chapter 3 – Gaps in education data and evidence

### Draft Recommendation 3.2

The Australian Government should request and sufficiently fund the agencies that conduct the Longitudinal Study of Australian Children and the Longitudinal Study of Indigenous Children to establish new cohorts of children at regular intervals.

The Department notes the focus on these two specific data sets and proposes that the Commission should look at longitudinal data options more broadly. There are a range of longitudinal collections already in place and any proposal to expand these by adding new cohorts to existing collections needs to be carefully considered in the broader context of what has already been collected, the capacity to draw data from multiple sources (including from administrative collections) and to link data. Consideration should also be given to the purpose of the proposed collection and an assessment of the best way to create that information – the best 'fit for purpose' methodology.

The Department would be interested in the Productivity Commission exploring what is the information they are proposing needs to be collected and what the most optimal arrangements would be, taking into account that there are a range of data collections, including administrative and sample data, which could provide the data being sought.

### Draft Finding 3.1

Ongoing initiatives should help to fill many of the identified data gaps.

- The Australian Government's proposal for a national Year 1 assessment should help to better assess performance of early school skills and to identify students who need early intervention.
- Work by the Australian Curriculum, Assessment and Reporting Authority, the Victorian Curriculum and Assessment Authority and relevant research institutes should help to improve methods and metrics for measuring non-cognitive outcomes.
- The Nationally Consistent Collection of Data on School Students with Disability should help to improve the monitoring of outcomes of students with disability.
- The development of a national minimum teacher dataset by the Australian Institute for Teaching and School Leadership should help to support workforce planning and assessment of initial teacher education.

These are important initiatives already underway that demonstrate the benefits that can be achieved for identified areas. Some further information follows on the national initiatives identified under this draft finding:

Nationally Consistent Collection of Data on Students with Disability (NCCD) – the NCCD involves schools collecting the number of students identified with a disability by: level of education (primary/secondary), category of disability (physical, cognitive, sensory or social/emotional) and level of adjustment (support provided within quality differentiated teaching practice, supplementary, substantial or extensive). The NCCD does not provide information on the education outcomes of students with disability, for which only limited (ABS) data continue to be available.

While the NCCD does not provide information on education outcomes, it is expected that the data collection will become part of a continuous process for supporting students with disability to fully access and participate in education.

National Minimum Teacher Dataset - the description in the draft report of the Australian Institute for Teaching and School Leadership (AITSL) work on teacher data should be clarified. The National Initial Teacher Education and Teacher Workforce Data Strategy is broader than just the national minimum teacher dataset. We note AITSL's submission refers to their work towards this strategy and refers to the national minimum dataset as an indication of the direction of the work.

### **Information Request 3.1**

The Commission seeks comment on whether the Australian Early Development Census could be used to monitor progress against Australia's early learning objectives.

The Australian Early Development Census (AEDC) is a national measure of children's development collected as they enter their first year of full-time school. It is considered to be a measure of how well children and families are supported from conception through to school age. The AEDC is a population-based measure. It is not designed to be an individual diagnostic tool. School results are provided to schools at a population level where data has been collected for groups of six or more children in a school to ensure privacy.

There is potential for the Australian version of the Early Development Instrument (AvEDI), the instrument used to collect AEDC data, to be used to collect data to monitor progress against Australia's early learning objectives. This could be achieved if data were collected, on behalf of children who attend an early childhood education program, towards the end of the year before starting full-time school and reported back to each service provider. Prior to embarking on such a project, further investigative work would be required.

## **Chapter 4 – Data collection, processing and reporting**

### **Draft Recommendation 4.1**

Agencies responsible for collecting education data should review and adjust their procedures to reduce the administration costs and the compliance burden on respondents, including by:

- to the greatest extent possible, collecting sample, rather than census data
- removing duplication in data collection and processing
- avoiding frequent changes to reporting requirements, but when changes are necessary, allowing sufficient time for respondents to comply with the new requirements.

The issues of duplication, compliance burden and avoiding frequent changes in data reporting have been a national priority of the Data Strategy Group.

The draft report proposes using sample data, rather than census data, to the greatest extent possible. It is unclear from the draft report if there are specific instances where the Commission would recommend a change from census to sample collections or from sample to census collections. It would be useful in its

final report if the Commission could indicate specific collections for consideration. In addition, it would be helpful if the Commission could look further into the circumstances and principles under which certain approaches to data collections might occur.

For example, where the primary purpose of the data collection is to determine a level of funding based on a per student enrolment, then a full cohort census may be warranted. This data then might be used for other secondary purposes.

Another example is in relation to assessment, where the primary purpose is to inform parents/teachers of an individual student's achievement level or to provide diagnostic information, then a full cohort testing should be used.

However, for the purpose of research or potentially system level indicators, sample or survey data, and periodic rather than annual collections, may be the most cost-effective mechanism to obtain the information needed.

The level at which the information might be used could also influence data collection methodology. For example, the AEDC is a census that informs policy for governments at all levels and also reports findings about early childhood development for communities. The AEDC also provides opportunities for data linkage as well as evidence to be able to monitor how small population groups of particular interest (such as Indigenous children in remote communities) are faring over time. A survey methodology would not allow linking, reporting and analysis to community level.

#### **Information Request 4.1**

The Commission seeks further information on:

- the costs and benefits of moving toward a national student identifier (compared to jurisdictional systems)
- the feasibility of using the unique student identifier system used in the vocational education and training sector to deliver more comprehensive student coverage
- the costs and benefits of children in the early childhood education and care sector being covered by the same identifier as school students.

Work is underway through the Data Strategy Group to develop a national approach to student identification management in the school sector. Developing a unique and persistent student identifier would enable the development of a high quality longitudinal evidence base for student outcomes. This would be of great value to researchers and policymakers, as it would allow greater insight into the longer-term outcomes of programs and interventions. A unique identifier would also facilitate data linking and enable educators to follow the transition of children across the education sector (early childhood, school, vocational education, higher education), between school sectors (government and non-government), a particular emphasis in our first submission, and between jurisdictions.

A national approach to student identity will provide significant advantages to parents and students as set out in our first submission. For example, it would provide higher quality and continuity of reporting records to parents and for students and streamlined enrolment processes for them and across schools, sectors and jurisdictions. It will also enable easier sharing of education information on student progress and related interventions when students move between schools, systems, sectors or jurisdictions.

## Unique Student Identifier in the Vocational Education and Training sector

The implementation of the Vocational Education and Training (VET) Student Identifier initiative has achieved the creation of over 5.5 million unique student identifiers since 1 January 2015. This reach could be extended to a broader population using the same principles that underpinned its successful introduction.

### *Implementation considerations*

The implementation across over 4,000 training providers and a significant student population was supported by the introduction of legislation and a regulatory framework, minor amendments to the existing registered training organisation standards, collaboration between the jurisdictions, the ability to leverage existing infrastructure, data collections and reporting processes and the development of an IT solution to allocate the Student identifier to individuals. An example of this is the use of existing Document Verification Service (DVS) to establish the uniqueness of an individual and maintain the integrity of the process.

Key implementation considerations of the initiative included how to:

- anticipate and manage an immediate high volume demand;
- minimise costs;
- limit the implementation impact on training providers businesses and administrative arrangements;
- engage students and training providers with the initiative;
- ensure the student identifier allocated is assigned to a unique individual; and
- ensure individuals' privacy.

### *Scalability of the Vocational Education and Training Unique Student Identifier (VET USI)*

Drawing on early experience with VET USI, identity systems could possibly be built largely from existing transaction points conducted between schools and parents, thereby leveraging existing registration processes. The same approach would likely be effective should the initiative encompass the early childhood education and care population.

It should be noted that a number of schools currently deliver VET to secondary students and already participate in the Student Identifier initiative. While the distinctive nature of the school sector may require adjustments in some processes, many of the core features of the VET USI will apply equally in this context.

### *Privacy*

Password protected online accounts can be a simple and effective way to give detailed control to parents/guardians over the creation and management of the Student Identifier and associated personal details, including which entities have access to which elements of a school record, thus addressing key privacy concerns.

Privacy is a key focus of the VET Student Identifiers legislative and regulatory framework. This framework specifies the circumstances under which, and to whom, the VET USI Registrar may release student identifiers.

A Privacy Notice/Disclaimer provides transparency to students about how their personal information will be protected. The legislation gives particular power to the Australian Information Commissioner to investigate any act or practice that may be an interference with the privacy of an individual. The Student Identifiers Office consults with the Office of the Australian Information Commissioner to ensure that privacy is maintained.

Although there is a mechanism for individuals to opt-out of the VET USI initiative on grounds of personal objection, to date less than 60 individuals have pursued this option. This suggests broad public acceptance and confidence in the initiative.

### *Benefits*

The value of an expanded authenticated student transcript that shows a full education history of students, education institutions of all types and employers is significant. It will not only be able to deliver connected and reliable education data for longitudinal studies but will also form a sound evidence base to inform the development of education and broader social policy.

### Unique Identifier for Early Childhood Education and Care

The costs and benefits of children in the early childhood education and care sector being covered by the same identifier as school students would need to consider that:

- children in child care already have:
  - a unique customer reference number (CRN) issued by the Department of Human Services to support fee assistance payments to families and this requirement will continue;
  - an identifier issued by the child care services to identify the child in the service;
- any opportunity to issue children with a new unique student identifier is likely to be limited to a point where there are major changes to the child care IT system and interface between services and the Australian Government to assist with the cost/benefit; and
- consultation with the industry and other government departments would be necessary to determine the value of implementing a new unique student identifier.

## **Chapter 5 – Access to education data**

### Draft Recommendation 5.1

Agencies responsible for education data collections should amend their processes for collecting personal information from parents/guardians to incorporate formal consent and notification procedures regarding the use and disclosure of personal information at the initial point of collection.

The issue of consent for personal information has been problematic for schools and their authorities. All schools have consent approaches in their enrolment processes and some have additional processes for specific collections.

The issue of consent has been considered through a number of data collection processes, for example, the NCCD. Agreeing on opt-out approaches and changing consent information has made significant improvement to data completeness for this collection.



### **Draft Recommendation 5.2**

The Australian Government should amend the *Privacy Act 1998* (Cwlth) to extend the arrangements relating to the collection, use or disclosure of personal information without consent in the area of health and medical research to cover public interest research more generally.

Amendment of the *Privacy Act 1998* would resolve some issues relating to the collection, use or disclosure of personal information without consent. Further investigation is required at a national level to assess how this will impact on data collected for research, policy or program support in jurisdictions.

### **Draft Recommendation 5.3**

The ACT Government should enact in its privacy law an exception to cover public interest research. In Western Australia and South Australia where there is not a legislated privacy regime, their privacy arrangements should reflect a similar public interest research exception.

Draft recommendation 5.3 is an issue for the Australian Capital Territory, Western Australian and South Australian governments to consider, however as per our comment under draft recommendation 5.2 above, the Department would encourage investigation of such an approach.

### **Draft Recommendation 5.4**

The Australian, state and territory governments should pursue legislative consistency in education and related Acts regulating the use and disclosure of education information, and amend legislation so that it is aligned with the intent of general privacy laws.

Such legislative change would require the collective agreement of the Australian Government and jurisdictions.

As noted in our first submission, child care administrative data is ‘protected data’ under the *family assistance law*. This legislation also covers data owned by other departments, such as the Department of Social Services. Accordingly any proposed changes to the use of this ‘protected data’ for education purposes (such as children attending child care/long day care preschool programs) would need a whole of Australian Government approach.

## **Chapter 6 – Data linkage**

### **Draft Finding 6.1**

The system of data linkage could be improved if linked data were retained by the linking authority.

This finding requires clarification and further investigation, particularly in relation to governance arrangements for data custodians holding linked datasets. Projects are unique and it may or may not be appropriate for a linking authority to retain a linked dataset.

Significant effort is currently made to create linked datasets and with appropriate governance there would be value in developing an approach that seeks to improve access to the linked dataset by other researchers for different analysis or for extending the linked data set with other data. Governance and privacy issues need to be assessed for each project, however, a principle could be adopted that seeks to support reuse of linked data. There may be models overseas that could be investigated, for example, in New Zealand.

## Chapter 8 – Governance and institutional arrangements

### Draft Recommendation 8.1

The Australian, state and territory governments should task the COAG Education Council to provide explicit policy direction through a new Education Agreement, which would build on prior agreements and define the:

- objectives
- nature of the research to be undertaken in the bottom-up evaluation of what works
- evidentiary standards or frameworks to be applied, including assessment of cost effectiveness
- requirement for translation of evidence into guidelines accessible by schools, early childhood education and care services and teachers.

They should also request the Education Council to:

- assign an institution to be responsible and accountable for implementation of the functions set out above and in Draft Recommendation 7.2
- specify the assigned institution's governance arrangements, functions and operations
  - including a responsibility for promoting a culture of using the evidence base by policy makers and educators.

### Information Request 8.1

The Commission seeks further information about the strengths and weaknesses of its proposed institutional and governance arrangements.

The Department considers that there are a range of ways in which the framework and recommendations outlined in the draft report could be delivered. This includes reconfiguring governance arrangements and assigning the required roles to existing organisations.

Existing institutional and governance arrangements could be strengthened to enable implementation of a framework focused on 'what works' to improve student outcomes. This could include the development of a research strategy and the development and implementation of a national information agreement with jurisdictions and education authorities to support better evidence and sharing of data.

The case for a new institution is not clear, particularly in relation to what role it would have that is distinct to the responsibilities of existing bodies, as well as the costs of such a body against the benefits it might bring. These issues would need to be considered.