

Productivity Commission Draft Report: 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 wide 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 AISs are often expected or required to help facilitate the collection of school information for the purposes of national and jurisdictional collections.

Overview

As identified in the Productivity Commission's Draft Report it is clear that early childhood education and care and school education is a significant contribution to the wellbeing and quality of life of young Australians. Whilst past and present governments have committed to national education goals to support excellence and equity in education, the delivery of reforms have not achieved the desired gains in education outcomes according to performance benchmarking and reporting against national indicators.

The main method for making these assessments have focussed on comparisons using international assessments such as PISA and the national standardised test, NAPLAN. While at a national level it may be possible to make comparisons based on a sample test of 15 year old students between Australia and other countries, or regions, national testing may not necessarily reflect the ongoing daily work of schools committed to raising outcomes at the school level.

NAPLAN is a diagnostic tool not an intervention. It can provide information about students' performance in limited areas but it does not provide comprehensive information on the interventions that could improve student outcomes. It could also be said that while NAPLAN testing is providing schools with insightful data on specific cohorts of students, it is a point in time snapshot that should not define the success or failure of a school.

For this reason caution should be exercised when using PISA or other sample international tests or NAPLAN results and the public reporting of results, to make judgements about schools and the quality of teachers, or to contribute to the discussion of the quantum of school funding being expended. It is important not to overlook or undervalue the work that occurs each day at schools

and ignore the complexity of the educator's role which can include dealing with the emotional and physical needs of students before they are able to focus on the task of educating children.

Pasi Sahlberg, Finnish educator and scholar, has said data from testing regimes "often don't spark insight about teaching and learning in classrooms, they are based on analytics and statistics, not emotions and relationships that drive learning in schools. They also report outputs and outcomes not the impacts of learning on the lives and minds of learners".¹

He believes that there are clear handicaps in how Big Data has been used in education reforms and that policy makers often forget that Big Data at best only reveal correlations between variables in education not causality. What he believes is now becoming evident is that Big Data alone won't be able to fix education systems. Decision makers need to gain a better understanding of what good teaching is and how it leads to better learning in schools. This is where information about details, relationships and narratives in schools become important.

Schools also have to contend with frequent changes in education reforms and policies that are presented as the next 'best strategy' to address falling student outcomes regardless of whether that reform or policy is appropriate for the school's context or student cohort. Policy makers should be aware that not all policies apply across different schools and contexts.

Ideally reforms should give a level of flexibility in delivering policy outcomes which then allows schools to tailor their actions to their specific context and student needs. Sometimes there is provision of additional funding that may be provided through jurisdictions or in the case of Independent schools, Associations of Independent Schools (AISs). The flexible use of resourcing for specific reforms is encouraged as it allows the necessary support for schools to deliver strategies that work for their context and students. It also allows schools to seek expertise outside the school gate and again, the Associations of Independent Schools often provide expertise and training to facilitate the development of school strategies.

However a frequent inhibitor of some education reforms is that they are usually limited to narrow timeframes and where there is resourcing available, it is limited for a very short time or not available to schools equitably. This does not allow a policy to come to its full fruition and allow sufficient time to see significant improvements or sustained results, nor does it allow sufficient time and resources to be used for effective evaluation. Schools know that any change in a strategy or policy direction takes time to engage teachers, to implement across the school, and to see the impact of the strategy in terms of changed outcomes. Initiatives that are most effective are those that encourage sustainability.

There is generally consensus around what is needed - a bipartisan, whole education collaborative effort to develop a national approach to improving outcomes in early childhood and school education. Part of this approach would be the development of a national education evidence base that encompasses all levels of education and government.

A National Evidence Base

As indicated in the draft report, a national evidence base is not just about a repository of national data, it is a much broader concept and requires both a top down and bottom up approach. At the

¹ Next Big Thing in Education: Small Data, Pasi Sahlberg and Jonathan Hasak* Published in [Washington Post](https://www.washingtonpost.com/news/education/wp/2016/05/09/next-big-thing-in-education-small-data/), 9 May 2016 <http://pasisahlberg.com/next-big-thing-education-small-data/>

national level, governments and sectors need to work together collaboratively to ensure data, research and evaluation findings can be shared appropriately and reported in a meaningful way. At the local level, schools and early childhood providers need opportunities to analyse data, and to research, trial and evaluate strategies, appropriate for their contexts. In addition, schools need to be supported to facilitate the sharing of successful evidence based strategies.

An evidence base is not just about data, it includes objective evaluative information about a collection of strategies that have been shown to be (or not to be) effective in a range of circumstances. It is encouraging responsibility for improving outcomes across all levels of education and trusting into providers of education and educators to contextualise solutions.

Improving outcomes is not just limited to those core skills emphasised through testing such as literacy and numeracy in NAPLAN. It is also about preparing students to be healthy, confident and creative individuals, able to interact and work successfully with others in a changing world. The development of these attributes can be captured through a range of qualitative, quantitative and mixed methods employed by schools to ensure that education is about the development of the whole child and without a purely academic or vocational focus.

The difficulty is that for some of these characteristics there is no agreed definition, single measure or way of collecting information that allows reporting at the national level. Reporting at the national level requires a robust and rigorous agreed definition and collection process. Data which is not rigorous or nationally consistent should not be reported publically at this level.

The Productivity Commission² has outlined a number of key principles for the development of a national evidence base framework. ISCA supports these principles:

- *Meet the varied needs of decision makers at all levels of the education system* – there needs to be ownership and responsibility by all levels of education and governments.
- *Provide high quality data and evidence to inform decisions* – agreed data and evidence may come from different sources and must be verified as fit for purpose.
- *Drive improved student achievement through four interconnected processes – monitoring of performance, evaluation of what works best, dissemination of evidence and application of that evidence by educators and policy makers* – understanding that a one size fits all process may not be appropriate for all contexts and that there needs to be flexibility for educators and providers to tailor solutions.
- *Generate benefits in excess of the costs incurred in collecting and processing data and in creating, sharing and using of evidence* – it should not be about creating new collections or processes adding to the burden at the school level but more about changing the way governments and providers/educators think about the data/evidence they have available to them and how this can be used in a meaningful way.

Identified in the Productivity Commission draft report is that central to this framework is the balance of a ‘top down’ monitoring and performance benchmarking of the system complementing a ‘bottom up’ evaluation of what works best in education policies, programs and teaching practices.

² National Education Evidence Base Draft Report, page 5

Top down monitoring and benchmarking are often used as a means of ensuring accountability or transparency, however when identifiable data are reported in the public domain they can lead to added pressure on schools and educators making these activities ‘high stakes’ for schools.

Evaluation plays a crucial role in determining which teaching practices and school programs are the most effective and offer the best value for money in terms of improving outcomes.³ There needs to be a level of trust and professionalism of schools and educators to allow a level of flexibility to research, develop, trial and evaluate local strategies.

Data – associated costs and benefits

There are a range of national data which need to be included in a national education evidence base to provide the full picture of education. Some examples include;

- Administrative data – provides the baseline information about schooling and early childhood sectors and students
- Teacher data – there is a Australian Institute for Teaching and School leadership (AITSL) project currently underway to create a national teacher data set
- Program data – related to the evaluation of specific learning programs and initiatives
- Outcomes data – not just standardised tests
- Wellbeing and engagement data – Data Strategy Group (DSG) project currently underway.

Most of these datasets are currently being collected or are in the process of being developed. The question is whether the right data items are being collected in order to assess what interventions and teaching strategies are most effective in improving educational outcomes.

Consideration is being given to linking data so that an individual student’s educational journey and outcomes can be tracked over time, across institutions and borders. Data linkage is covered in the section below however it is also important to note that a level of technological capability is required for schools and systems to provide data in this form and currently it is not possible for this to happen nationally across all sectors.

Currently many ‘low technology’ Independent schools are supported by the Australian Government Department of Education and Training and Associations of Independent Schools to complete national data collections. As noted elsewhere in this submission and in ISCA’s earlier submission, for many schools reporting is an onerous task which ties up considerable resources. Any additional collections would need to be very closely examined to ensure that they are an effective use of a school’s time and that effort is made to streamline data collections to ensure that the cumulative reporting burden does not become too great.

Data sharing

Theoretically, there is benefit in enabling data sets to be shared and linked as it expands the possible uses of a given data set. However, there remain some significant issues with data linkage and also with

³ National Education Evidence Base Draft Report, page 7

the concept of expanding the Unique Student Identifier (USI) across schools and the early childhood sectors ranging from the potential costs to on-going privacy concerns.

Introducing a USI into the school sector would require a significant upfront investment. The experience of Victoria in introducing a cross-sectoral USI was that it was a significant undertaking both financially and in terms of supporting schools through the process and also on an on-going basis. There is also a very strong view that a USI is not necessary in the schools sector and that the same benefits could be achieved through data linkage.

The Australian Longitudinal Learning Database (ALLD) proposal put forward in 2012 had similar issues in terms of cost for the Independent sector. Being non-systemic, Independent schools use varying modes for reporting and currently do not provide unit record level data for any collections. It was estimated that for the Independent sector to participate in the ALLD there would be a similar cost to that of introducing a USI.

Privacy issues also arise in the case of data linkage. For example the Tri-Borders Project was intended to track and provide continuity of learning for remote Indigenous students across all school sectors in WA, SA and NT. However, issues arose with jurisdictional privacy legislation including the types of data which could and could not be shared. This has impacted on the overall effectiveness of the project for tracking a particularly disadvantaged cohort and it is unlikely that in the current context it will be able to be extended nationally.

There is also an overarching concern for the Independent sector around ensuring that any linkage of data sets is done on the basis of appropriate use and sound policy rationale regarding educational benefit rather than as an end in itself. Data sets also need to be evaluated to ensure that they are fit for purpose. The use of data sets for purposes for which they were not intended needs to be closely scrutinised to ensure the data is not being taken out of context or misused.

Privacy

As noted in ISCA's earlier submission to the Inquiry, "there are complex privacy arrangements in place across different levels of government and in the school sector significant work still needs to be done to address these issues to facilitate information sharing, in a manner similar to the health sector."⁴

In this context ISCA referred to the action of the Australian Government to amend the Australian Education Regulation 2013 in late 2014 to enable the *Nationally Consistent Collection of Data on Student with Disability* (NCCD) data to be collected and reported without explicit consent from parents. Inconsistent privacy arrangements and legislation across jurisdictions had resulted in differing consent arrangements across the states and territories which affected the comparability of the data in what was intended to be a national data set. To this end, ISCA would support attempts to make privacy arrangements across states and territories consistent.

A subsequent side-effect of the introduction of the Education Regulation 2013 for the NCCD data collection has been that as Independent schools were required to provide the data under legislation, where collection notices had been provided to parents, they were no longer required. This lessens the awareness of what is being collected. It is also unclear if parents are aware of the

⁴ http://www.pc.gov.au/data/assets/pdf_file/0004/199660/sub039-education-evidence.pdf, page 7

potential uses of the information being provided through this data collection including the potential use of these data for funding purposes.

The Data Strategy Group (DSG), a sub-group of the Education Council, is currently working towards a National Information Agreement (NIA) for schooling. It is intended that the NIA should go some way to addressing some of the existing barriers to data sharing, including around questions of privacy.

ISCA supports further refinement of the privacy notices provided to parents and guardians regarding the formal consent and notification procedures regarding the use and disclosure of personal information at the initial point of collection. ISCA has previously raised concerns that current privacy notices may not provide enough information to parents/guardians regarding the actual uses of data collected by schools.

For example, it is highly likely that parents are not aware that the parental background data they provide on enrolment forms is used for funding. These data are used to calculate the low SES loading component of the current funding model via the use of socio-educational advantage (SEA) quartiles calculated by the Australian Curriculum, Assessment and Reporting Authority (ACARA) for the purposes of creating the index of community socio-educational advantage (ICSEA).

ICSEA was created “specifically to enable meaningful comparisons of National Assessment Program – Literacy and Numeracy (NAPLAN) test achievement by students in schools across Australia”⁵ not for funding purposes.

Data comparability

As noted in the draft report, there are data comparability issues across a range of school sector data collections. Not only are there differences between school sectors, there are also differences between states and territories. Given that the government and non-government sectors are structurally different, one of the main areas of difference is in regard to finance data and how this data can be presented in a comparable way.

In the development of the *My School* data set for public reporting, the issue of comparable finance data was a significant one. There is a section on the *My School* website dedicated to explaining the financial limitations of the data by sector and state/territory, the methodology used to produce the data and the accounting advice from Deloitte. It notes that “while every effort has been made to make school financial information comparable there are limitations that need to be recognised, especially when comparing school finances across sectors.”⁶ This is also true of other financial reporting for schooling such as in the *Report on Government Services* and the *National Report on Schooling in Australia* which report on public funding and public and private funding and expenditure respectively and data provided to the Australian Charities and Not-for-profits Commission (ACNC).

Data management systems can also impact comparability. As noted in the draft report, NSW government schools are currently unable to implement the *National Standards for Student*

⁵ <https://www.myschool.edu.au/AboutUs/Glossary/glossaryLink#main>

⁶ <https://www.myschool.edu.au/MoreInformation/Finance/FinancialLimitations/2014>

Attendance Data Reporting. Systems issues can also impact on the ability of schools and systems to provide data in a comparable manner in other contexts.

The National Schools Statistics Collection (NSSC) is managed by the Australian Bureau of Statistics (ABS) and the data is provided directly by the state and territory Departments of Education and from the non-government sector via the Australian Government Department of Education and Training. While currently these data are reported at the aggregate level, some jurisdictions are able to provide this data to the ABS at unit record level. This is not however possible for the Independent sector. The Independent sector has within it schools that do not have a level of technological capability which would enable unit record level (URL) reporting. Often these schools are small and/or remote and would require a significant financial investment to enable reporting of this type.

One of the other examples noted in the draft report is that of the *Nationally Consistent Collection of Data on School Students with Disability*. The methodology for this collection is completely different to other collections in that it relies on teacher assessment of adjustments provided to students, a subjective measure, rather than an objective measure such as a medical diagnosis, for counting students with disability (SWD). This approach means that consistency of judgements across schools, sectors and jurisdictions is a significant concern to the Independent sector.

ISCA would also like to note that while the draft report states in Finding 3.1 that “the *Nationally Consistent Collection of Data on School Students with Disability* should help to improve the monitoring of outcomes of students with disability”⁷ the NCCD is not intended to assist teachers monitor the progress of SWD or assist them in responding to their needs; it is a count of students.

Consistent metadata across all collections is one way in which some level of consistency can be achieved between data collections. Some collections already use common definitions so that data can be reported once and used for multiple purposes, such as the non-government school census data which is used for both the NSSC collection and the ACARA *My School* data set.

Data capture, processing and management

The school sector is already highly involved in the provision of data for a range of accountability requirements at both the state and national level. Further to this, there are a range of data collections and surveys that schools may be selected for or choose to opt in to, again at the state, national and also international level. For many Independent schools this is a significant burden in terms of the resources required to fulfil these requirements.

The DSG undertook a stocktake of the data collections in the early childhood and school sectors which showed that there was not in fact a huge degree of overlap between collections. It seems as if the mantra of ‘collect once, use often’ is actually in use to some degree. And this extends in some cases beyond the education sector. For example the Australian Charities and Not-for-profits Commission (ACNC) uses the Financial Questionnaire data provided by non-government schools and systems to fulfil the financial requirements for the Annual Information Statement for charities.

⁷ National Education Evidence Base Draft report, page 24

If the aim of a national education evidence base is to improve the usefulness of education data without adding additional reporting to burden to schools, there needs to be an assessment of the utility of what is being collected currently compared to what is useful for educators, schools, and parents to know, and for collections to be designed accordingly.

Currently education data is being used by a range of stakeholders for a range of purposes. State and territory governments collect data on their own education systems and students for a range of purposes including research on program efficacy, student characteristics, attendance etc. If such research is not known outside the jurisdiction, there is a high chance of duplication of effort by other jurisdictions or missed opportunities for collaborative activity. While a number of fora exist for information sharing of this nature, perhaps a register of education research, including government and university level research, would provide a starting point for any future research activity.

With regard to data transfer, there are issues that can limit the ease with which data can be transferred by schools to governments and other collection agencies. As noted in the section below, some Independent schools are limited by technology and lack of connectivity. The lack of a consistent privacy framework nationally also makes institutions wary about what is able to be shared and with whom.

Technology

The technological capability of a school is a core component of its ability to collect and collate data, and to transmit and store data efficiently. While many non-government schools and systems have access to adequate computer systems and internet access, some still do not. When a data collection is introduced by the Australian Government for schools, it is often the case that the Department of Education and Training will devise an option for 'low technology schools'. For example, for the Student Attendance collection, the department provides an on-line calculation tool for those schools unable to do the calculation themselves with their own systems. Many small and remote Independent schools fall into this category.

The draft report notes that "smart use of technology can reduce duplication and improve data quality, including timeliness in reporting. Information technologies can also make data collections simpler to use and easier to interpret by educators, parents and the community."⁸ While this is true, there is still a group of schools which requires support in this regard.

This lack of technological currency impacts on the ability of these schools to adopt new practices or to undertake additional data reporting. For the Independent sector it is a significant impediment to the introduction of possible changes such as a Unique Student Identifier. Many schools would require assistance to implement such a change to their systems, and it is possible that for a subset of Independent schools, such a change would not be possible without a significant financial investment by government(s).

⁸ National Education Evidence Base Draft Report, page 12

Analytical and Research Capability

In the Independent sector, schools have a level of autonomy that allows greater flexibility in how school funds are allocated and prioritised. Many have used this flexibility to build teacher capabilities to use and analyse data and to conduct school-based research. The Associations of Independent Schools (AISs) also have a key role in building this capacity by providing expertise and resources, including support to schools through the *Students First Support Fund*, to facilitate this activity. School-based research may be conducted in conjunction with a university, research partner or the AISs focussing on an area that will lead to greater understanding of the impact of current practices as well as the introduction of new strategies.

Developing research capacity in schools can be a difficult process. The time and the resources required to free up educators to conduct research is often challenging for schools. Not all teachers have the research skills or the capacity to analyse data/evidence. They require guidance from a mentor or a supportive staff member who is able to steer them through the process and build capacity through the identification and provision of targeted professional development. Again for Independent schools this may come through the services of AIS consultants.

Some experienced teachers are afforded the position and time to work with other teachers in developing capabilities across the school in research, evaluation and data skills. For those teachers choosing to be identified and certified as Highly Accomplished and Lead Teachers in the Australian Professional Standards for Teachers, there are requirements to support and lead teachers in evaluating strategies and conducting school-based analysis and research.⁹ Schools however need to be supported to provide educators the opportunities for school-based research and to provide the necessary analytical skills for optimising school data.

States and territories have their own priorities in facilitating education research and while there are some opportunities for collaboration and sharing within and across jurisdictions, there is further opportunity to build on this research capability more widely with other sectors and jurisdictions.

More Australian-based education research would also benefit from greater access to research funding to encourage local researchers to investigate issues for Australian schools. The level of expenditure in education research is far outweighed by that which is spent on health and medical research.

Initial Teacher Education (ITE) providers also have a key role in instilling a culture of research and analytics for new teachers as part of their education programs. There needs to be clear identification of the development of these skills in ITE programs.

A necessary part of a national education evidence base, should be the understanding that any research conducted must be accessible by families. As important partners in their children's education and development it is essential that families are engaged with research and that any findings are presented in an easy-to-understand manner.

⁹ <http://www.aitsl.edu.au/australian-professional-standards-for-teachers/standards/list>

Data governance arrangements

The draft report, through findings and recommendations, sets out an overarching framework for the development of a national education evidence base. However this work does not exist in a vacuum and does in fact parallel work being undertaken by the Data Strategy Group (DSG) which is working towards a National Information Agreement (NIA) for schooling. An NIA already exists for Early Childhood.

It is ISCA's view that given the overlap in the work being undertaken by the DSG in relation to the National Information Agreement and by this Inquiry, that the Productivity Commission (PC) and the DSG should discuss ways forward to achieve these goals so as to avoid having a disconnect between the work of the DSG and the PC whilst working towards the same ends.

While the draft report recommends assigning an appropriate body the task of fulfilling the recommendations of the report, it would be unrealistic to expect a body or authority to take on such a significant additional role without appropriate resourcing.

Addressing the Draft Report Recommendations

DRAFT RECOMMENDATION 2.1

In supporting the further development of a national education evidence base, governments should be guided by the following principles.

The national education evidence base should:

- *meet the varied needs of decision makers at all levels of the education system*
- *provide high-quality data and evidence to inform decisions*
- *drive improved student achievement through four interconnected processes — monitoring of performance, evaluation of what works best, dissemination of evidence and application of that evidence by educators and policy makers*
- *generate benefits in excess of the costs incurred in collecting and processing data and in creating, sharing and using evidence.*

ISCA supports the guiding principles for a national evidence base. It must be a collaborative and inclusive endeavour across all levels and sectors of education. The non-government school sector should be part of the consultation process in the development of a national evidence base.

DRAFT RECOMMENDATION 3.1

In assessing whether to improve the quality of existing education data, governments should examine whether:

- *there is a need to improve the quality of the data so it is fit for purpose*
- *data quality improvements are feasible given the context of data collection*
- *other options are available*
- *the benefits of improving data quality exceed the costs.*

ISCA strongly supports the assessment of education data in terms of whether it is fit for purpose, to ensure that any improvements do not place added burden onto schools and that there is a cost benefit analysis for any changes or additions to current processes and ideally clear links to improving educational outcomes. Any examination should take into account the level of additional resourcing required and the impact on Independent schools.

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.

ISCA supports the recommendation and also suggests that the Longitudinal Survey of Australian Youth (LSAY) also be considered in this context. LSAY provides longitudinal data on students from school through to post-school destinations including tertiary education. The data provided by LSAY is the only data of its kind on pathways and transitions and is an important research resource.

DRAFT RECOMMENDATION 3.3

Australian, state and territory governments should support greater use of value-added measures of education outcomes.

ISCA supports the greater use of value-added measures of education outcomes. Improving student outcomes is a complex endeavour that requires a collection and analysis of a range of information. Measuring outcomes through limited testing processes does not provide information on progress and achievement over time. It is critical that meaningful and comprehensive methodologies are used to calculate value-add measures of education outcomes and to ensure it uses appropriate data.

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.*

ISCA supports the monitoring of procedures for the collection of education data to ensure the burden at the school level is commensurate with the value of the data to the education community. Where there are changes required, Independent schools require sufficient time for communication about the changes to understand what the changes are and their benefit and to adjust their processes which may include working with software vendors.

Unlike education systems, Independent schools require a greater lead time to ensure that all the necessary processes are ready and that staff are trained in what is required. Independent schools in smaller jurisdictions are often frequently involved in testing, survey and data collections and this has been particularly exacerbated by the increasing trend to report by sector at the national level. Reporting by sector should only be conducted where there has been prior agreement for this to occur and if there is meaningful educational value for all schools - not just because the data is available to report by this disaggregation.

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.

ISCA supports further refinement of the privacy notices provided to parents and guardians regarding the formal consent and notification procedures regarding the use and disclosure of personal information at the initial point of collection. ISCA has previously raised concerns that current privacy notices may not provide enough information to parents/guardians regarding the actual uses of data collected by schools including where it is ultimately used for funding purposes.

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.

While supportive of efforts to streamline processes to facilitate information sharing and research, ISCA would need further information as to how such a change would affect the privacy of parents and students.

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.

ISCA would support moves towards national consistency whilst cognisant of our comments in respect of draft recommendation 5.2.

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.

ISCA would support moves towards national consistency whilst cognisant of our comments in respect of draft recommendation 5.2.

DRAFT RECOMMENDATION 5.5

The Australian, state and territory governments should introduce policy guidelines which place the onus on data custodians to share data unless a privacy (or other) exception can be justified.

In his submission to the Inquiry, the Privacy Commissioner noted that data custodians are often unnecessarily circumspect when it comes to data sharing. ISCA supports more transparency and certainty for data custodians in relation to when and how data is able to be shared without impinging on privacy concerns. This would enable data custodians to feel more willing to share data sets as appropriate.

DRAFT RECOMMENDATION 7.1

The Australian, state and territory governments should ensure that an online metadata repository for education data collections is created. The approach used by the Australian Institute of Health and Welfare could serve as a model.

ISCA supports the creation of an online metadata repository for education data collections. Further work is needed however to look at appropriate governance models and to address any possible privacy concerns.

DRAFT RECOMMENDATION 7.2

The Australian, state and territory governments should pursue a national policy effort to develop a high-quality and relevant Australian evidence base about what works best to improve school and early childhood education outcomes. In particular, five activities need to be supported:

- *development of research priorities*
- *commissioning of high-quality education research*
- *adoption of rigorous research quality control processes*
- *dissemination of high-quality evidence*
- *development of researcher capacity.*

ISCA supports a coordinated national policy effort to develop a high quality and relevant Australia evidence base. It is important to have a structure in place that supports and advances a national evidence base. It will require collaboration across jurisdictions and sectors and the involvement and support of all levels of the education system. The development of data analytics and research and evaluation capabilities will provide opportunities for schools to be proactive in school-based research with the appropriate support from mentoring organisations such as the Associations of Independent Schools. There should be more opportunities for schools and early childhood providers to partner with universities and researchers, to be school-based/centre based “Centres of Excellence” and to lead and share their evidence with other schools in their community. There needs to be a strategic policy effort to prepare research literate teachers and

school leaders and to build a culture of trust and collective autonomy. The responsibility sits with all levels of government and with organisations that play a role in Initial Teacher Education.

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.*

As noted previously, it is ISCA's view that the Productivity Commission (PC) and the DSG should discuss ways forward so that work on creating an Education Evidence Base and the work going into creating a National Information Agreement for schooling are complementary and that the same work is not being undertaken by different groups.