

**EDUCATION EVIDENCE BASE: COMMENT ON THE PRODUCTIVITY COMMISSION
DRAFT REPORT**

**Submission to the Productivity Commission National Education Evidence Base
Inquiry**

October 2016

The Population Health Research Network (PHRN) welcomes the opportunity to comment on the Productivity Commission's National Education Evidence Base: Draft Report.

The PHRN's submission includes responses to requests for information.



General comments

Page xi Abbreviations: PHRN should read Population Health Research Network

Information requests

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 nationwide data collection of early childhood development at the time children commence their first year of full-time school. The AEDC is one source of information available to researchers, policy analysts, decision-makers which could be used to monitor progress against Australia's early learning objectives. Linkage to other administrative and research datasets using existing data linkage infrastructure, would enable more robust monitoring and reporting.

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**

The cost of moving towards a national student identifier may be the limiting of education research because:

- a. the use of a Unique Student Identifier will not solve the problem of linking education data to data collections outside of the education sector such as births, deaths, hospital, justice and housing
- b. there are legislative and ethical barriers to using an identifier created for one purpose which is then used for another purpose.

Probabilistic linkage using identifying variables such as name, address, date of birth and sex provides better linkage quality than a Unique Student Identifier when linking across years, geographical locations and data collections.

5.1 **The Commission invites participants to comment on the operation of the section 95 guidelines in health research and lessons for other forms of research including education**

The Commission may like to review the following manuscript on the topic:

Carolyn Adams and Judy Allen (2014)'s article titled "Government databases and public health research: Facilitating access in the public interest" comments on the operation of section 95 guidelines in health research. <http://sites.thomsonreuters.com.au/journals/2014/07/03/journal-of-law-and-medicine-update-june-2014/>

5.2 The Commission invites participants to comment on the operation of mutual recognition in the health area and any lessons it provides for education research

The NHMRC's National Approach to Single Ethical Review has delivered certification of HRECs and the recognition of single ethical review within and between jurisdictions¹. Despite there being some acceptance of single ethical review of multi-centre clinical trials, many linked data projects are still required to undergo full HREC review in every jurisdiction supplying data. For those research projects focusing on Aboriginal and Torres Strait Islander populations, researchers are also required to undergo full HREC review with Aboriginal Health Research and Ethics Committees in each jurisdiction. Incorporation of data linkage projects into the National Approach should be considered.

In the absence of single ethical review, the PHRN has developed a one-day comprehensive training package for HREC members in an effort to assist in the efficiency and consistency of decision making when reviewing data linkage applications.

The Commission may also like to review the following manuscripts on the topic:

The Senate Select Committee on Health's report on *Big health data: Australia's big potential* reported on the approvals processes including the challenges associated with ethics approvals for linked health data research in Australia.

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Health/Health/Sixth_Interim_Report

Rahimzadeh and Knoppers (2016) article titled "How mutually recognizable is mutual recognition?" comments on the operation of mutual recognition in Canada, UK, USA and Australia. <http://www.futuremedicine.com/doi/full/10.2217/pme.15.52>

Draft recommendations and findings

Draft Recommendations

Draft recommendations in the report are generally supported. Draft Recommendation 5.2 which addresses a significant barrier to use of personal information without consent in areas outside of health and medical research is considered of particular importance.

Draft Findings

The meaning of Draft Finding 6.1 is not entirely clear. In the context of a linking authority, the system of data linkage would certainly be improved if linkage variables were retained by the linking authority. It would be further improved by development of an enduring national master linkage key containing pointers to existing state and territory master linkage keys. PHRN is providing funding support to AIHW to progress development of such a national master linkage key.

¹ National Health and Medical Research Council. The national approach to single ethical review of multi-centre research [internet]. Canberra: National Health and Medical Research Council; No date [cited 11 March 2015]. Available from: <http://hrep.nhmrc.gov.au/national-approach>