



03 October 2016

Commissioners Jonathan Coppel and Julie Abramson  
National Education Evidence Base  
Productivity Commission  
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Dear Commissioners

Telethon Kids Institute is pleased to provide a response to the draft report of the National Education Evidence Base Inquiry. This response follows on from the Institute's initial submission to the Productivity Commission's Issues Paper.

The responses below are in the order the Information Requests and Draft Recommendations appear in the draft report.

### **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 Telethon Kids Institute considers the Australian Early Development Census, on its own, is not a suitable mechanism to monitor progress against Australia's early learning objectives for the following reasons:

1. Until such time as the early learning objectives are clarified it is premature to identify which measures might be suitable.
2. The AEDC is conducted every three years. The time between censuses will reduce the ability of stakeholders to monitor the impact of policy changes in the short term.
3. The AEDC is focused on identifying vulnerabilities. This means areas of relative strength are unable to be identified and built upon.

### **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.*

Agree.

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### **Draft Recommendation 3.3**

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

Agree.

### **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.*

A national student identifier will enable a national view of progress and assist in the move to achieving consistency in jurisdictional datasets. It will also improve accuracy of datasets by ensuring children are counted only once.

Telethon Kids Institute supports implementing one student identifier covering both the early childhood and school sectors. In the absence of one identifier, data linkage will be required to undertake longitudinal studies. This will incur financial and time costs that could be eliminated by the introduction of one identifier across both sectors.

### **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.*

Agree.

### **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.*

Agree.

**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.*

Agree.

**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.*

Agree.

**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.*

Agree.

**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.*

Agree.

**Information Request 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.*

In Western Australia, when cross-agency linkage is required, researchers apply through the WA Department of Health Human Research Ethics Committee (DOH HREC). This approval is seen as appropriate ethics approval to access data from other WA agencies. Applicants can apply to DOH HREC by means of the WA Health Ethics Application Form or the National Ethics Application Form v2.0 (NEAF) with the WA Specific Module. Applicants for cross-jurisdictional projects (i.e. multi-centre projects which span jurisdictional boundaries) that require personal health information from the Department are encouraged to use the NEAF and Module when applying to DOH HREC. The NEAF must be used for projects utilising the National Approach to Single Ethical Review of Multi-centre Research (i.e. National Approach).

The Population Health Research Network is aimed at creating Australia's first national data linkage network. Their online application system enables approval to be obtained from multiple jurisdictional custodians simultaneously. Further information is available at: [www.phrn.org.au](http://www.phrn.org.au)

**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.*

Agree

**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.*

Telethon Kids Institute considers a national policy effort requires an emphasis on research translation, not just dissemination, to ensure high-quality evidence results in enhanced outcomes for children.

**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.*

Agree.

*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.*

Agree.

Yours sincerely

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