**CATHOLIC
EDUCATION**
MELBOURNE

In reply please quote:

25 May 2016

Mr Jonathan Coppel
Presiding Commissioner
Inquiry into the National Education Evidence Base
Productivity Commission
education.evidence@pc.gov.au

Dear Mr Coppel

Submission to the Inquiry into the National Education Evidence Base

Thank you for the opportunity to make a submission to this Inquiry. A submission from Catholic Education Melbourne (CEM) is attached to this letter.

The CEM represents the 331 Catholic schools in the Archdiocese of Melbourne, which educate over 150,000 students. Given this our focus in this submission is exclusively on the schooling sector, from the perspective of Catholic schools in Melbourne.

I would be pleased to further expand on any of the issues raised in this submission should you require.

Yours sincerely

Stephen Elder
EXECUTIVE DIRECTOR

Submission to the Inquiry into the National Education Evidence Base

This submission presents CEM perspectives on four issues:

1. The role and benefits of national datasets
2. Assessments of school performance
3. The importance of robust data collection procedures
4. Barriers to data sharing.

1. Role and benefits of national datasets

CEM recognises that national datasets can make a significant contribution to schooling policy, research and practice. The key dataset currently used by the CEM in our research is the MySchool national dataset released by ACARA. This contains information on school profiles (size, location, enrolments, teaching and non-teaching staff, etc.), as well as tailored financial information and aggregate NAPLAN results, for all schools in Australia. CEM also values the school census data published by the ABS.

CEM currently uses these datasets for a range of purposes including:

- Comparing the performance of Catholic schools in NAPLAN in Melbourne to other schools
- Benchmarking financial characteristics of schools (funding allocations, private income, etc.)
- Assessing enrolment market shares of Catholic schools in Melbourne and sub-regions
- Comparing the efficiency of the Victorian and Melbourne Catholic systems to other school systems.

CEM further recognises that national datasets provide assistance to the Australian Government in its critical role in funding schooling, particularly the non-government school sector.
The Schooling Resource Standard (SRS) funding model could not, for example, exist in its current form without nationally consistent collection of data on various school and student attributes.

However, CEM is not convinced that the national collection of more schooling data (with one exception – discussed under the second issue below) would add much benefit to current arrangements. This view is based on a number of observations.

First, although CEM highly values the role of the Australian Government in funding schools, it is the states and territories which have primary responsibility for regulating schooling. State registration requirements regulate quality and dictate what schools must do in order to operate as a school. As a result, policy-making on schooling is largely a state responsibility. Moreover, the schooling challenges facing each state and territory can be very different. In Victoria, the main challenges are to lift school performance from already-high levels, and to address pressures from high population growth. The Northern Territory must deal with various challenges arising from high Indigenous populations. Other states and territories are different again. In this context, local data collections targeted to meet local needs may provide the most benefit. The diversity in schooling challenges across jurisdictions is reflected in the difficulties that have arisen in developing national education objectives (and data collections) relevant to all jurisdictions. It is also reflected in the fact that the key, national policy documents we do have do not contain one set of objectives (or a framework) that all jurisdictions, schools and practitioners are currently working from or toward.
How much benefit can national datasets have when the educational objectives of each jurisdiction are (justifiably) different?

Second, many states and territories (and non-government systems, in our case) already have abundant data to make valuable findings on important issues in schooling relevant to their own circumstances. CEM, for example, has a wealth of data on student and school performance in

Catholic schools across Victoria measured annually over time (through the Victorian Student Number). This already enables extensive data analysis with large sample sizes using our own data (e.g. student performance in NAPLAN in Catholic schools in Victoria). States and territory governments overseeing larger schooling systems would be privy to even more internal data to conduct research.

Together, the above factors generally mean that states and territories (and non-government systems, in our case) can already undertake significant research, using internal data, to address the specific issues they face and inform and monitor their varying objectives for schooling. To the extent there are shortcomings in the current arrangements, these might be addressed through better sharing of data between school sectors within states. For example, CEM considers there would be a research benefit if it were able to access data on student NAPLAN performance in Victorian Government schools, to benchmark performance (this is not currently made available to CEM). We would have less interest in benchmarking our performance against other systems interstate. So the additional benefit that would come from nationally consistent datasets in many instances (at least in schooling) may not be large. Any data collected nationally would need to be carefully targeted to a limited number of matters of national interest and relevance. Data should not be collected for its own sake. CEM is also concerned that nationally consistent datasets give rise to risks of duplication and red tape where the data prompts the Australian Government to attempt to regulate schooling. This was most recently observed with various provisions of the *Australian Education Act 2013* relating to school improvement plans, school reporting and reporting to student families on performance. Most of the new requirements that the Australian Government established were already part of school registration requirements in Victoria.

More generally, CEM considers there would be far greater benefit to education outcomes in Australia from better using the data and research we already have (as referenced on pages 14-15 in the Issues Paper), than in collecting more data (including nationally consistent data). There are considerable opportunities, for example, to better share existing information on students (including their learning needs) between kindergartens and primary schools, and primary schools and secondary schools.

Translating evidence and research to inform policy and practice is also a major challenge. Effective implementation of schooling reforms is a bigger barrier to school improvement than the research that might inform the reforms. Even where research findings are compelling, there is a lengthy, demanding and time-consuming process to effectively implement these in schools. It is clear there is a great opportunity for improvement in this area. There is often confusion and misguided assumptions made about whose job it is (or is not) to make evidence and research more available and accessible to inform policy and practice. School leaders and practitioners look to jurisdictions and researchers to make research findings clear and practical. Jurisdictions expect researchers to present clear and concise outcomes and to co-create recommendations with real potential for impact. Meanwhile, academic researchers assume jurisdictions and school personnel will understand and embrace their writing and research methodology. The real opportunity for change lies in parties clarifying, accepting and embracing their roles in the translation of research and evidence.

Where new research is conducted, this could be better directed to improve education outcomes. More consideration needs to be given to how decisions are made about educational research and what data/evidence is generated. School systems and jurisdictions across the country (including CEM) receive hundreds of research requests each year. Some have great potential to benefit students, practitioners, school leaders and systems – while others have little connection to the core work of schools. Rather than school stakeholders most often being participants in research, or the recipient of findings, there is great opportunity for the schooling sector to be more active partners. This includes driving decisions about merit and validity and considering how we might better channel resources into research aligned with our education objectives.

CEM also has concerns that national datasets underpinned by flawed data collection procedures can actually have negative impacts on schooling outcomes, because this diverts resources from schools and classrooms. This is further discussed in item 3.

2. Assessments of school performance

In the section above it was highlighted that there is one exception to CEM's general view that the national collection of more schooling data would add little benefit to current arrangements. This relates to data on school performance.

Student and school NAPLAN results can be enormously valuable when used appropriately. At present, however, school performance seems to be assessed exclusively based on NAPLAN results. This is evident in the lists of "high performing schools" released by ACARA each year, and various research by other parties that examines, for example, whether there is any benefit from attending non-government schools based on statistical analysis of NAPLAN results. The national NAPLAN data fosters a fixation on the narrow outcomes that are measured.

This is not a reasonable basis to assess whether non-government schools represent "value for money" or are "high performing". NAPLAN results were never intended to be used this way by policy makers. This is clear from the *Melbourne Declaration on Educational Goals for Young Australians* and the *National Education Reform Agreement* which emphasise the importance of less-tangible outcomes and 21 century skills such as engagement, social and emotional wellbeing, creativity, problem solving and intercultural understanding. Despite the importance of these skills being widely recognised, we have still not made significant headway into measuring these types of outcomes consistently across Australia.

The current arrangements are therefore dissatisfactory to CEM. While CEM fully supports and values NAPLAN testing, many stakeholders use NAPLAN results inappropriately – in essence, to judge schools – largely because this is the only national data that is available which might be used for this purpose. But this does not fairly portray the myriad way that schools help to develop students, nor does it match our schooling policy aspirations. From this unfortunate position – and notwithstanding the reservations we have expressed above about national datasets – there would be merit in advancing progress on the collection of nationally consistent data measuring progress against our other national objectives. As a minimum, this would bring some much-needed balance and perspective into assessments of school performance.

3. The importance of robust data collection procedures

Data collection procedures for national datasets must be rigorous and enable accuracy. If these essential requirements are not met then data can become a distraction that can have negative impacts on schools. Schooling is a very complex sector that has become increasingly politicised in recent times. The politicisation of schooling extends to schooling data, especially when data has connotations for school funding or school performance. Data that is not rigorous and accurate often becomes contested (between school sectors or jurisdictions), which then leads to precious time and resources being diverted away from teaching and learning in schools.

A prime example of this problem is now occurring – the Nationally Consistent Collection of Data on School Students with Disability. This data collection methodology has at least three flaws that undermine rigor and accuracy:

1. School staff are responsible for assessing the number of students with disability in each school and the education adjustment provided to them – yet it is highly unlikely they can do this on a consistent basis

2. The school staff responsible for these assessments are highly likely to be aware that the data may be used in future to guide allocations of government grants. This creates incentives for school staff to overstate both the number of school students with disability and the educational adjustment provided to them at their school

3. The level of education adjustment assigned to students for their disability in this collection is based on what is currently provided by each school, not on what each student actually "requires". Thus, the level of education adjustment depends in part on school resources so this will not be consistent across schools.

These flaws partly explain why the data that has been collected to date is inconsistent with other datasets on the incidence of disability between states overall and between school sectors. Despite the problems, it has been proposed that this "nationally consistent" data may be published for each school and also used to determine in some way how government grants targeted for students with disability will be allocated in future. The next steps in this process will be predictable:

- Various stakeholders are likely to argue, with justification, that the data compiled for their school is not consistent with the data compiled for other schools

- Given this, there will be strong resistance from various parties to publication of the data and, especially, use of the data to determine school funding allocations by the Australian Government

- There will be ongoing debates over data collection methodologies and how these might be improved. It is unclear whether a methodology that is likely to provide accurate and reliable data can be developed.

As a result of the above, it is unlikely that this data collection process will actually deliver on the objective of the Nationally Consistent Collection of Data on School Students with Disability, and lead to significant benefits for students with additional learning needs.

4. Barriers to data sharing

A key barrier to data sharing between agencies, which was not highlighted in the Issues Paper, is the potential misuse of data. There are many parties operating across or commenting on the education sector who pursue their own partisan and sectional agendas with no benefit to students or education outcomes. Too often, schooling data is misused and misrepresented by these parties to advance their particular interests. This has the effect of distracting stakeholders and diverting resources from what should be the overarching goal: improving outcomes for all students and schools.

The misuse and misrepresentation of schooling data is commonplace. One example relates to the annual release of updated MySchool data. This is invariably followed by a series of "research" and newspaper articles comparing funding levels between government and non-government schools, by public education advocates who seek to shift public funding from non-government schools to government schools. A recent article to this effect authored by Peter Martin was published on 19 May in The Age ("Failing grades for both sides on education policy").

The funding comparisons these articles contain are often misleading for one reason or another. Often the schools whose funding is compared are "cherry-picked" to make a non-government school appear to be "over funded". Similarly, school funding is frequently compared based on school ICSEA scores, even though ICSEA scores are constructed to explain school NAPLAN results not school funding requirements. ICSEA scores actually exclude the single most important

driver of school costs (which is school size), plus other key factors that impact school funding needs (e.g. school enrolments of students with disabilities, school provision of VET and so on).

However the misuse of education data is not limited to public education advocates. Some of the most disappointing misuses CEM has recently observed have been perpetuated by public sector agencies. These include the Victorian Government and the Victorian Auditor-General's Office (VAGO).

In a recent report by the Victorian Government[1], the Victorian Government published NAPLAN data comparing student performance in Victoria across the three schooling sectors. The Victorian Government sought to argue that much of the difference in performance in government schools compared to other sectors could be "explained" by differences in student parental occupations. The data was selected to support this argument. Moreover, the inclusion of these direct sectoral comparisons breached established protocols on the publication of NAPLAN data. The actions of the Victorian Government to circumvent these protocols breached our trust. It is the understanding of CEM that the Victorian Government gave an explicit undertaking to the Victorian Curriculum and Assessment Authority (VCAA) that it would consult with the Catholic and independent school sectors before publishing the data. It chose instead not do this.

For its part, VAGO recently published a report[2] that contained detailed data on how Catholic system authorities in Victoria redistribute untied state recurrent grants between Catholic systemic schools in Victoria. (VAGO compelled CEM to provide this information under its information-gathering powers.) This information was essentially meaningless since the Catholic system in Victoria distributes funding to schools using single funding models that pool untied recurrent grants from both the Australian and Victorian governments. (The Victorian Government does the same for government schools.) The key matter of interest should have been the *total* amount of recurrent public funding that Catholic schools receive under Catholic system funding models. Nonetheless, VAGO focussed on redistributions of state recurrent grants only, which appeared to show that Catholic education redistributes public funding from disadvantaged Catholic schools to advantaged Catholic schools. In contrast, an analysis of CECV distributions of total public funding would have showed that Catholic system authorities distributes a greater share of funding to high-need students and schools than comparable funding models. In CEM's view, VAGO took this approach in order to generate media interest in its audit. The data published by VAGO was indeed cited by the media, but will not improve any aspect of school performance, school accountability or school funding in Victoria.

These form only small selection of instances CEM has observed where CECV data (as part of national datasets) has been misrepresented by others. These lamentable practices are becoming more common as all aspects of schooling (school performance, school funding, school accountabilities, and so on) have become more politicised. Ultimately, this contributes to mistrust and risk aversion within the education sector on data-sharing. This is regrettable since better data-sharing between schools, school systems and jurisdictions (although not necessarily the creation of national datasets) can make a contribution to better policy and improvement in educational outcomes.

Appropriate data governance arrangements and data sharing protocols are essential to addressing this issue. Certainly, data custodians must be independent of all school sectors and of state and territory governments, which have a conflict of interest in many aspects relating to non-government schools. ACARA and the VCAA have generally worked well in this regard.

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[1] *Government Schools Funding Review: Greater Returns on Investment in Education*, Final Report, Victorian Government, December 2015,
[2] Victorian Auditor-General's Report, *Grants to Non-Government Schools*, Victorian Government, March 2016.