



National Education Evidence Base

25 May 2016

About the National Catholic Education Commission

The National Catholic Education Commission (NCEC) is established by the Australian Catholic Bishops Conference through the Bishops Commission for Catholic Education to maintain effective liaison with the Commonwealth Government and other key national education bodies. The NCEC complements and supports at the national level the work of the State and Territory Catholic Education Commissions.

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Introduction

The National Catholic Education Commission (NCEC) welcomes the opportunity to make a submission in the context of the Productivity Commission's inquiry into the National Education Evidence Base.

In an environment requiring greater accountability from schools in relation to student achievement and finite resources, it is critical that education policy decisions are made based on the best evidence possible. This can operate on two levels: accessing existing research and evidence, and generating new research and evidence. Evidence in either case needs to be robust, high-quality and have practical relevance.

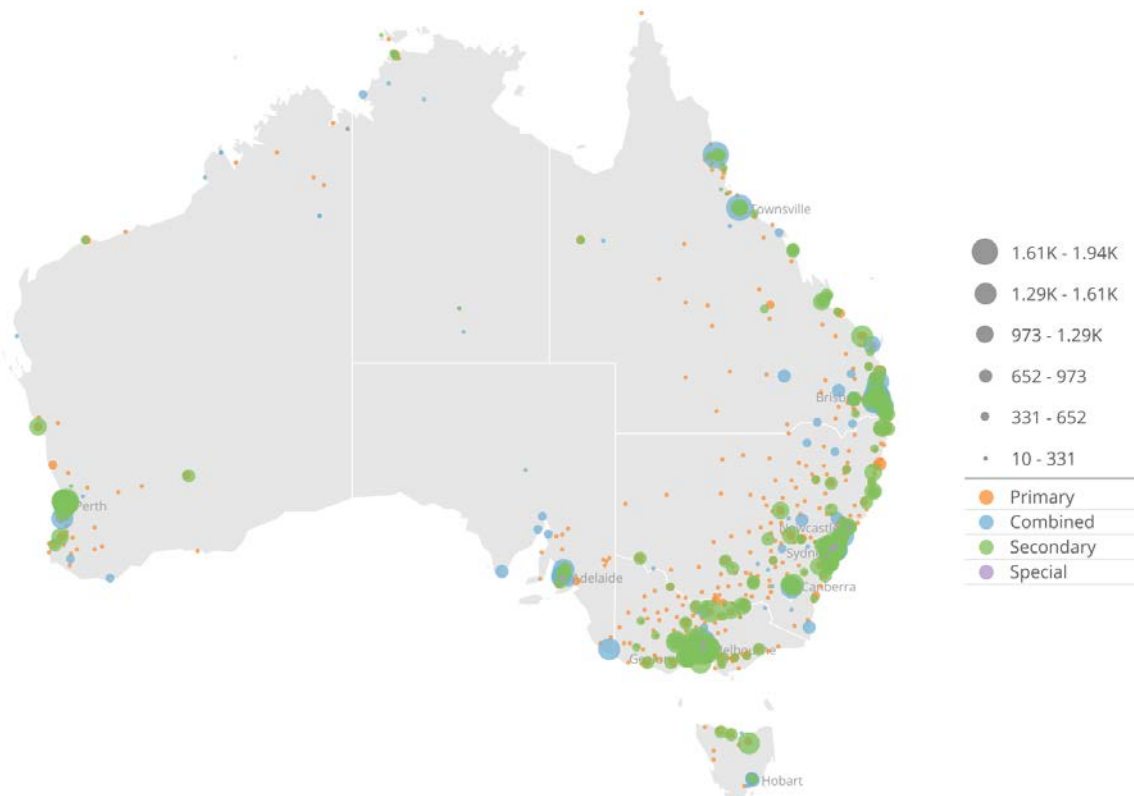
Data are an essential component of a robust evidence base, but a distinction should be made between data that are collected for reporting and public accountability, and data that are collected for public policy research and development. The Productivity Commission has indicated that its terms of reference require the inquiry to focus on data for an education evidence base that will shape policy development and improve educational outcomes. The NCEC welcomes this focus.

The NCEC submission itself focuses on the themes that the Commonwealth Treasurer has set out as the Productivity Commission's terms of reference for this inquiry. Wherever possible, the NCEC submission has also sought to address the questions that the Productivity Commission has set out in the Issues Paper on the National Education Evidence Base. It begins with some brief background on Catholic schools in Australia and ends with high-level conclusions that summarise the main points of the NCEC submission.

Catholic Schools in Australia

The Catholic education system in Australia comprises early learning centres, primary and secondary schools as well as tertiary education, including two universities. Catholic schools educate more than 760,000 (or one in five) students in 1,731 systemic and non-systemic schools across Australia. Catholic school communities are geographically, economically and socially diverse: they are located in all states and territories, in metropolitan through to very remote communities, and they educate students from all socioeconomic backgrounds. Catholic schools also include a diverse range of school types, including special schools, majority Aboriginal and Torres Strait Islander schools and sole-provider schools. Figure 1 shows the proliferation of Catholic schools across Australia, by size and type.

Figure 1—Full-time equivalent students by Catholic school: Size and school type, 2015



The mission of Catholic education, since its inception, has been to serve students from a range of socioeconomic backgrounds, with a particular responsibility for the disadvantaged and marginalised. Since 2003, the number of Indigenous students in Catholic schools has doubled. Since 2004, the number of students with disability in Catholic schools has doubled. This reflects one of the cornerstones of Catholic education—that all children because of “their dignity as human persons, have an inalienable right to education”, adapted to their ability.¹

The governance arrangements of Catholic schools in Australia

Catholic schools have been part of Australia’s education story for 200 years and their governance structure is characterised by a rich and diverse yet unified tradition. The principle of subsidiarity is a core principle guiding the administration and operation of Catholic education. Decision-making is delegated to the most appropriate level under this principle. The governance arrangements of Catholic education span a variety of autonomous education (employing) authorities and comprises 25 diocesan Catholic education offices, as well as a number of “independent” Catholic schools. The employing authorities are supported by state/territory and national representative bodies (“Commissions”). For example, in New South Wales, the Catholic Education Commission NSW (CECNSW) works together with diocesan directors, religious institutes, and principal and parent associations to represent the 11 diocesan Catholic school authorities. These school authorities directly manage the 543 “systemic” Catholic schools in NSW, under the canonical

¹ *Gravissimum Educationis*, Declaration on Christian Education (October 28, 1965), http://www.vatican.va/archive/hist_councils/ii_vatican_council/documents/vat-ii_decl_19651028_gravissimum-educationis_en.html, viewed 4 May 2016.

authority of the respective diocesan Bishop. CECNSW also works together with 45 “independent” Catholic schools, which are managed either independently or by a religious institute.

Catholic schools in Australia interact with a raft of federal and state laws. In each state and territory, Catholic schools are subject to local registration and accreditation requirements as well as other applicable legislation. They are also subject to the *Australian Education Act 2013*. However, there are also cases where Catholic schools are subject to federal laws instead of state laws. For example, unlike government schools, which are governed by varying state and territory privacy legislation, non-government schools are subject to federal privacy legislation. Similarly, whereas non-government schools are subject to the regulation and reporting requirements of the Australian Charities and Not-for-profits Commission (ACNC), government schools do not provide financial data to the ACNC.

Given its national reach and involvement across the learning continuum from early childhood through to adult education, Catholic education can provide a unique perspective on the issues raised in the Issues Paper.

A comprehensive evidence base to inform policy development

At the outset, it is important to distinguish between education data per se and the concept of a national education evidence base. Research datasets and administrative records are rich sources of information that underpin an education evidence base. Although data are an essential element of any evidence base, the ultimate purpose of the Productivity Commission inquiry is the evolution of a national evidence base for both early childhood and school education. A robust evidence base would draw on quantitative and qualitative data, research and evidence, and would be able to meaningfully inform policy development and decision-making. Good data is a prerequisite but not sufficient by itself for the formation of an ideal national evidence base. Given the Productivity Commission Issues Paper focuses on the underlying data of a national education evidence base, the NCEC submission will particularly explore the data dimensions of a comprehensive evidence base.

As the preamble of the *Australian Education Act 2013* states, the Australian schooling system should be of “a high quality and be highly equitable in order for young Australians to become successful learners, confident and creative individuals, and active and informed citizens”. This aspiration is the cornerstone of a successful workforce, strong economy, and better productivity. The preamble also underscores that Commonwealth Government support will “be based on the needs of Australian schools and school students, and on evidence of how to provide an excellent education for school students”. By further developing the national evidence base for schooling, government policy can support all children to achieve excellent outcomes, regardless of their postcode or life circumstances.

It is worth noting that there are a raft of national projects which have already made progress in developing the data needed to build the national evidence base required to improve education outcomes for all young Australians. One of the challenges of enhancing and consolidating the national education evidence base is in fact navigating the existing intergovernmental policy discussions and data projects that are under way. Much of this work is being undertaken through the COAG Education Council, and in particular through the Data Strategy Group of which the NCEC is a member.

The collection of data for a national education evidence base should also respect the diversity of Catholic education and its governance arrangements, which may not be able to solve some data issues as easily as the government sector, where there is a single school owner, operator and

employer. The governance arrangements of Catholic schools are more devolved. Moreover, not all Catholic systems are of the same size and capacity. For example, although there are 588 Catholic schools in NSW and 493 Catholic schools in Victoria, there are 37 Catholic schools in Tasmania and 30 Catholic schools in the ACT. This diversity and the potential impact of any new data-gathering process in different jurisdictions should be considered. Early consultation with affected parties is essential.

A national evidence base should not become an exercise in data for data's sake

Catholic education believes the national education evidence base should be wide-ranging, longitudinal and ambitious, with well-considered linkage opportunities across datasets both within and beyond the education domain. However, it should not become an exercise in data for data's sake. The evidence should be framed by strategic objectives and an overarching purpose. Moreover, a broad education evidence base, characterised by considered, valid and reliable measures that track progress and significant changes over time, should not sit in isolation from evidence available on health and social welfare. It should be possible for education data to be linked to health data and welfare data in a meaningful way. Although it may not be able to identify causal relationships, linked data can provide insights into educational disadvantage and make correlations between school outcomes and life outcomes. Moreover, Catholic education believes that data on the non-cognitive skills of students would add significant value to the education evidence base, though such skills are inherently difficult to measure. The non-cognitive skills of students, including indicators of wellbeing, are a vital dimension of a holistic education provided by a school and an integral part of the richness that Catholic schools—which educate the whole person—have to offer.

One of the challenges education policy faces is whether data showing how our students and schools are faring nationally and internationally can also tell us what forms of teaching and learning are the most successful. That is, how can data answer the cause and effect questions related to schooling? The way we measure student learning and make meaningful comparisons with other data beyond the education sphere is important. For example, while Australia's national test of literacy and numeracy—NAPLAN—is an important data source for student progress, it does not always facilitate meaningful comparisons with different groups of students, and the comparisons it does allow are limited in scope.² NAPLAN compares schools which are comprised of different cohorts but the potential for the data to provide insights into groups of students within a school or system is also important. Universal collections and comparisons are not desirable if they cannot be used to target policy interventions at a school or system level. There is a need for better data linkages, which can offer a clearer picture of student progress and explore the social and other determinants of educational outcomes. For Catholic education, the role of the family is paramount and, as a consequence, relevant family circumstances form part of the planning that Catholic schools undertake to improve student outcomes.

Consolidating and interrogating the data

Just as the collection of education data should be underpinned by strategic objectives at the outset, a robust education evidence base should consolidate and interrogate the data needed to shape governments' policy decisions and inform national priorities. This closes the loop which begins with the purpose and objectives that frame any data initiative, continues with the collection and analysis of the data that build an education evidence base, and then provides Australian governments and all school authorities with the evidence that can influence public policy development, which in turn can feed back into the evidence base through a post-factum assessment of policy implementation.

² See P. Goss et al, *Widening gaps: what NAPLAN tells us about student progress* (Grattan Institute, 2016).

Standard definitions and the use of quality data

Standard definitions of complex matters such as socioeconomic status and disability will assist in better analysis of student data. Along with robust analysis and standards of data, this would in turn improve the evidence base and enhance any future policy development and decision-making process to improve student outcomes.

On the meaning of socioeconomic status (SES), at this stage there appear to be two different definitions derived from two separate datasets, one direct (school-collected parental background data) and one indirect (ABS Census data). The former is patchy and incomplete and its quality has not significantly improved. Moreover, it is open to manipulation. The latter is more complete and accurate but describes the local community, not the school itself—though they are highly correlated. The Commonwealth Government uses the ABS data to construct the SES index it uses to determine levels of non-government school grants. ACARA uses the school-based data to calculate its Index of Community Socio-Educational Advantage (ICSEA) and the same data form the basis of the Commonwealth calculation of ‘low SES’ for the purposes of calculating a loading under the *Australian Education Act*. ICSEA was originally developed for the purpose of grouping schools in lots of 60 for school comparisons on the basis of NAPLAN results only and is published on ACARA’s *My School* website as part of the Socio-Educational Advantage (SEA) model.

In relation to the definition of disability, the Nationally Consistent Collection of Data (NCCD), currently there are multiple definitions of disability: state and territory definitions, the NCCD definitions and others. Evidence requires the best possible data. At this stage there are serious technical and quality limitations around the use of the school-based family background data and the NCCD data.

In both cases, more rigorous analysis and standards of collection are required before they can be considered robust enough to constitute educational evidence.

Existing or potential barriers to the sharing of education data

Privacy legislation is an important consideration when developing a national education evidence base. However, there is an inclination in the education sector to accept privacy barriers as inevitable in a way that does not apply overseas or, for example, in the health sector locally. Although public perceptions of the education and health spheres suggest there may be more community support for privacy barriers to be overcome in the latter, it is worth questioning whether a similar model that is robust and founded on good governance could be realised in education. As the Issues Paper notes (p. 21), in the context of medical research there is a waiver under the *Privacy Act 1988* (Cth) that allows health data to be accessed without consent. Although efforts to build a comprehensive and rich database in education should not arbitrarily contravene Privacy Principles set out in Commonwealth privacy law, barriers to the sharing of education data prevent strong correlational research from occurring. There is added complexity for education data in terms of privacy legislation: whereas the non-government sector is subject to Commonwealth privacy law, the government sector is subject to state privacy laws.

Although privacy legislation has a legitimate purpose, the limits and barriers it creates inhibit data linkage and necessitate practices such as the de-identification of unit record data or mitigates against the adoption of unique student identifiers. Data collection in respect of small cohorts also presents a challenge. Privacy legislation can also engender unexpected obligations on education authorities. One example of how privacy law is an important consideration is Australian Privacy Principle 8—transborder data flow—which places greater obligations on entities in relation to the cross-border disclosure of personal information than were previously required. In certain

circumstances, schools may be liable for any breach of privacy by an overseas entity in relation to the disclosure of a record of personal information originally sourced from a school.

Data linkage and a unique student identifier

There is a need to make student data more accessible for data linkage, which could provide further insights into student achievement. A unique student identifier (USI) is a way of addressing this need. It would be an opportunity for longitudinal data that could provide insights across the life cycle of learning—from early childhood to post-school pathways. There is already some progress in this area. The Commonwealth Higher Education Supported Student Number (CHESSN) is a unique identifier that identifies a student who is supported by the Commonwealth Government. And since 2012, following agreement by the Council of Australian Governments, a USI has evolved that enables students to obtain a complete record of their Vocational Education and Training (VET) enrolments and achievements from a single source. Although the *Student Identifiers Act 2014* and the national Information Communication Technology (ICT) system that support the current arrangements are limited to the VET sector, there is potential for this initiative to go beyond this sector. In Victoria, it is currently the case that all students can be identified by a state-wide unique student identifier. The Victorian Student Number (VSN) was implemented in 2009—for students in government and non-government schools—as well as students below the age of 25 undertaking VET.

These examples of unique student identifiers show how reliable longitudinal data can be harnessed to build an evidence base that will shape robust education policy. A USI that goes beyond the VET sector would begin to address the need for consistency between early learning, primary and secondary data collection standards. As well as the benefits arising from the longitudinal data it would create, a USI could minimise data entry errors and reduce the regulatory burden on schools. It can also facilitate better monitoring and support for student learning when a student changes schools or sectors. One question that would need to be examined carefully is whether there is more of a need for a school USI to be a national exercise, as opposed to a state-based initiative with data linkages across jurisdictions. As the Issues Paper acknowledges (p. 17), although deterministic linkage is the method that frames a USI, probabilistic linkage is also a way of linking datasets. The timing for generating a USI is also an important consideration, taking account of the increased priorities being given to early childhood education and care.

Factors that inhibit access to, and consistency of, education-relevant data to support evidence-based policy development

Part of the challenge in gathering the data needed to support evidence-based policy development is managing transitions to new technologies and the associated cost implications. For example, the move to NAPLAN online is an important initiative that will support the collection of education-relevant data. However, the move to NAPLAN online has the potential to involve significant costs for Catholic schools. The transition requires significant investment in ICT infrastructure.

Accessing data from regional and remote areas

Another challenge to accessing education-relevant data to support evidence-based policy development is collecting data from regional and remote areas of Australia. The comparability and timeliness of education data depends on the nature and coverage of the systems used to capture and manipulate data. Monitoring the progress of Australian governments in meeting nationally agreed targets can often be difficult if data is not timely or data from some regional areas or remote Indigenous locations are not available. For example, if the Council of Australian Governments wishes to monitor Australia's progress in lifting attainment rates or examining the proportion of young people engaged in work or study, the data from regional and remote areas

has either not been available or been reliant upon the ABS Census data, which is collected once every five years. Catholic education faces similar challenges in collecting data from Catholic schools located in regional or remote areas of the nation.

The role of technology and mobile devices

Technology can play an important role in achieving timely and quality data but can be a barrier for remote schools or schools that lack adequate resources. As well as making data more timely and of greater quality, technology should enable schools to collect and provide data more easily, thus reducing the administrative burden. Technology will also empower teachers to improve teaching and learning through access to online resources and opportunities to collaborate with other schools in metropolitan areas on questions of how to use student data to inform pedagogy. This is especially the case in remote areas of Australia where children are developmentally vulnerable.

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However, accessibility and adoption of technology is a difficult endeavour for Catholic schools in regional and remote areas such as the Kimberley, parts of the Northern Territory and Queensland. For example, remote Catholic schools in the Kimberley currently rely on satellite technology to transmit enrolment and attendance data, which is an impractical way of conveying information. The cost of data systems and access to broadband internet in remote areas—especially for non-government schools—can be prohibitive. There is a role for the Commonwealth Government in helping schools overcome these barriers that goes beyond supplying the nbn™ network. Whilst an infrastructure project of this magnitude is welcome, Catholic education would benefit from associated infrastructure that supports the capacity of schools in regional and remote areas to embrace technology that has been inherently easier for metropolitan schools to harness.

The costs and benefits of options for improvements to the national education evidence base

Catholic education will generally be wary of the costs of collection of additional data, especially if it is mainly for reporting and accountability purposes, rather than policy development or classroom use. The impact of the costs of such collections will often be greater for Catholic schools than it will be for government schools. This is, in part, because of the devolved governance arrangements of Catholic schools. Although Catholic schools devote considerable time and resources to meeting reporting requirements, they do not have the staff and resources that the government sector has at its disposal. Therefore it is important to balance data for data's sake with data that have a clear and strategic purpose.

The challenges of open data and the proliferation of information

Although the 21st century has seen a move towards open data and the proliferation of information, this can render the sheer magnitude of the data overwhelming. Less data can be more powerful and effective if it is prioritised and harnessed in a strategic way. The inevitable questions for a national education evidence base is whether data—and what data—should be national or state-based and what data will be the most fruitful in improving Australian educational outcomes. It is important to be strategic in choosing the datasets that will support Australia's national goals and priorities for education.

Catholic education supports a national education evidence base that will shape and be shaped by national education policy and strategy. However, the temptation to use data as a comparative toolkit that ranks jurisdictions or makes comparisons that are not meaningful should be mitigated. Data that informs policy development and practices to improve student outcomes and facilitates public accountability should be prioritised according to the objectives of a national education strategy. A relevant example of this is teacher education and teacher workforce data.

Teacher education and teacher workforce data

Teacher education and teacher workforce data in Australia are not currently consistent, which limits the effective use of the data nationally. This is a matter that the Australian Institute for Teaching and School Leadership is currently investigating, especially given teacher development and teacher quality is a national education priority for the Commonwealth Government. There is a need for a national database that collects and identifies relevant information on Australia's teachers but this must be framed by a national teacher education and teacher workforce data strategy. Catholic education believes that clear objectives and student outcomes should underpin a national approach to teacher data. The data would ideally assist policy-makers, universities, regulators and employers to drive effective planning and enrich the teacher life cycle. However, it is important that a nationally consistent measurement and data framework considers the costs and benefits of implementing such a framework.

Data governance

This also raises the related matter of data governance and access. The ownership of data, data custodians and access to data are questions that must inform consideration of whether there should be a central holding agency. Data governance should strive for simplicity and efficiency wherever possible—without compromising data integrity and institutional accountability—so that it increases connectivity between relevant groups and reduces the duplication of efforts that may come about from a lack of aligned purpose. The more governance complexity there is, the less successful the evidence base will be. As the Issues Paper notes, Australia's current data governance arrangements are generally complex and out of date (p. 32). A precondition for improving and further developing the national education evidence base is streamlining and modernising data governance arrangements. Given the legitimate privacy concerns discussed earlier in this submission, data governance needs to be robust, transparent and participatory. With respect to participation, this criterion could be met by the creation of a governing board that is representative of all education stakeholders and is responsible to the COAG Education Council.

Insights from overseas

There is an opportunity to gather relevant insights from the experiences of other governments in this area. For example, the Abu Dhabi Systems and Information Centre is responsible for the IT and transformation agenda within the Abu Dhabi Government.³ This initiative spans more than 50 Abu Dhabi Government Entities. A key aspect of the strategy is the multi-year Abu Dhabi Government Data Management Programme and its Data Management Standards.⁴ However, any insights one might glean would need to be adaptable to the Australian context.

Other examples of how overseas governments use data to improve outcomes include:

- the National Information Infrastructure Project in the UK⁵
- the Education Data Initiative in the US⁶
- Research Data Canada.⁷

³ See https://www.abudhabi.ae/portal/public/en/abu_dhabi_emirate/government/news/, viewed 6 May 2016.

⁴ See <https://www.abudhabi.ae/cs/groups/public/documents/attachment/mgfk/mdyy/~edisp/ad062021.pdf>, viewed 6 May 2016.

⁵ See <https://www.gov.uk/government/publications/national-information-infrastructure/national-information-infrastructure>, viewed 6 May 2016.

⁶ See <https://www.whitehouse.gov/blog/2012/01/19/unlocking-power-education-data-all-americans>, viewed 6 May 2016.

⁷ See <http://www.rdc-drc.ca/about-us/>, viewed 6 May 2016.

Conclusions

The NCEC submission has outlined its support for a meaningful national education evidence base that is of the highest quality. This evidence base should underpin public policy development and decision-making in education; it should not serve as a basis for imposing further levels of accountability on schools or become an exercise in data for data's sake. NCEC recommends that the evidence base:

1. references strategic objectives and an overarching purpose, drawing on robust quantitative and qualitative research to meaningfully inform policy development and decision-making;
2. overcomes barriers to data linkage, particularly privacy obligations, which can enable strong correlational research and lead to powerful insights—this entails robust, streamlined and participatory data governance;
3. correlates evidence available on health and social welfare—and learns from the approaches to data in those sectors—whilst also incorporating data from the affective domain of schooling, which relates to the linkages between student wellbeing and learning;
4. mitigates the temptation to use data as a comparative toolkit that ranks jurisdictions or schools and makes comparisons that are not meaningful;
5. acknowledges the diversity of Catholic education and its governance arrangements, as well as the potential costs of new data collections or implementing new technologies for Catholic schools.