

Productivity Commission Review into the National School Reform Agreement

NSW Submission – June 2022

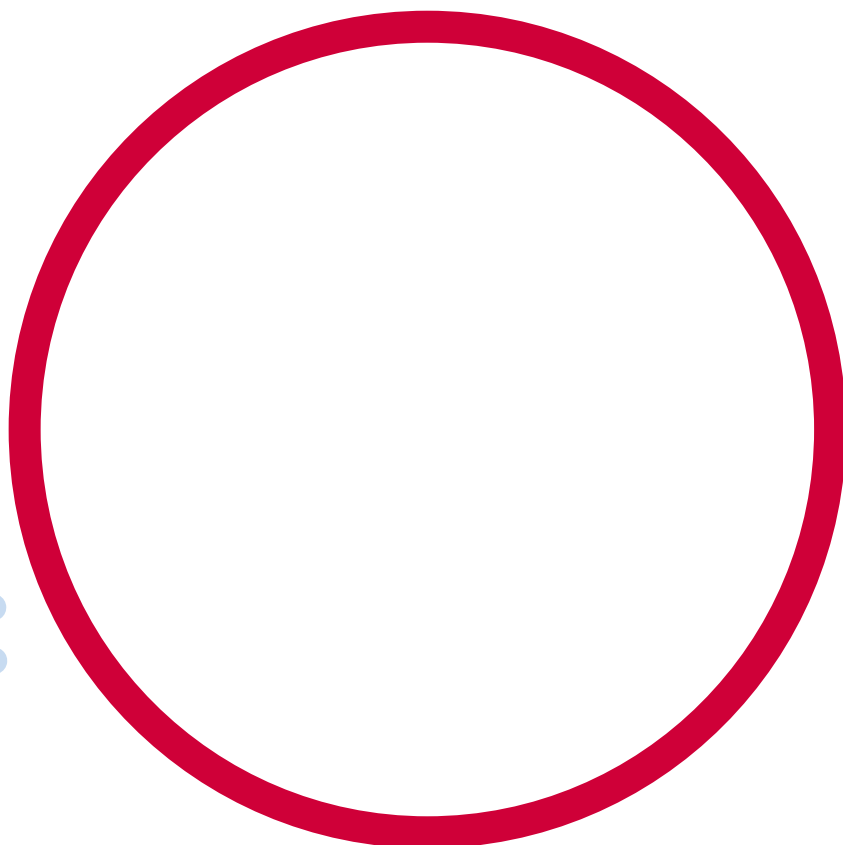
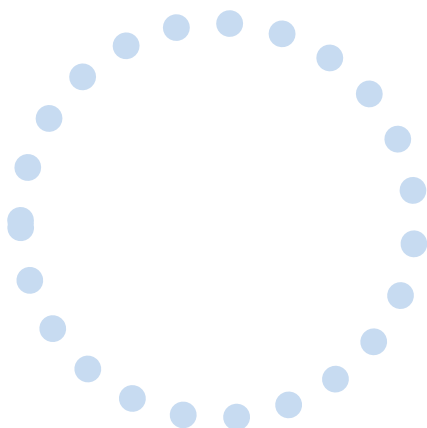
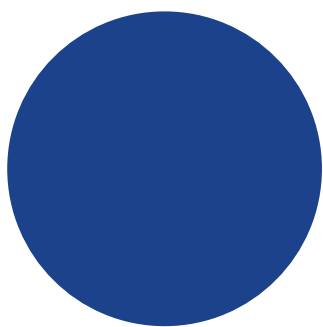


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Introduction

The last five years have posed significant challenges for our education sector. From droughts, bushfires, mice plagues and floods to the wide-scale disruption caused by the pandemic, teachers and school staff across all sectors have shown incredible resilience and commitment.

These disruptions have sharpened our commitment to our vision for education in NSW: to ensure every student is equipped to lead a rewarding life as an engaged citizen in our rapidly changing and complex society, and that every student is known, valued and cared for in our schools. We are also focused on retaining and attracting a high-quality teaching workforce to ensure the best possible learning and wellbeing outcomes for children.

We appreciate the opportunity to respond to the Productivity Commission (PC) review of the National School Reform Agreement (NSRA). This submission focuses on the National Policy Initiatives (NPIs) in the current NSRA and the National Measurement Framework (NMF).

This review is an important first step in an ongoing conversation with states and territories and stakeholders as we work towards the next school funding agreement. The submission does not represent NSW positions on potential future policies for the next agreement. We consider this review as an opportunity to establish a new paradigm for national collaboration that achieves outcomes for students, teachers, schools and the wider education community.

Scope of this review

NSRA and the NPIs were developed based on the twin principles of equity and excellence in Australian schooling.

The NSRA and the NPIs within it were developed partly in response to the 2018 Report, *'Through Growth to Achievement: Report of the Review to Achieve Educational Excellence in Australian Schools'*, chaired by Mr David Gonski AC. NSW notes that the three priority areas identified in that report are broadly reflected in the agreed outcomes within the NSRA, namely:

- Academic achievement improves for all students, including priority equity cohorts;
- All students are engaged in their schooling; and
- Students gain the skills they need to transition to further study and/or work and life success.

The NSW Government strongly supports the principles of equity and excellence and outcomes. These should be the critical measures of how well we are delivering our national education reform agenda for our schools and students.

The National Measurement Framework (NMF) underpins national reporting of school data, including data reported on the ACARA My School website, the ACARA National Report on Schooling data portal and the Report on Government Services released by the Productivity Commission.

The framework supports the Alice Springs (Mparntwe) Education Declaration which NSW was a signatory to and which states that “*Australian Governments commit to continuing to provide public reporting that:*

- focuses on improving performance and student growth and outcomes for all students
- provides parents with information on their child’s performance, progress and outcomes
- is locally, nationally, and internationally relevant
- is accessible, timely, consistent and comparable.”

Key performance measures in the NMF cover participation, student achievement and student attainment.

Summary of NSW Response

The eight NPIs that were agreed as part of the NSRA in 2018 are at varying stages of maturity. Some have potential to deliver positive and tangible impacts on students’ outcomes but the impact has yet to be realised. Others are complete, yet their tangible impact is not clear or felt by education systems and sectors in NSW.

On the basis of experience delivering the NPIs to date, NSW is concerned that the vision of the Gonski review for a package of reforms delivered together is not being realised. This review is the opportunity to establish a new paradigm for national collaboration that achieves outcomes for students, teachers, schools and the wider education community. NSW also considers that the review provides an opportunity to address concerns around the appropriateness of the National Measurement Framework and ensure that the measures are informative.

This submission is structured around the four following broad information requests, put forward in the call for submissions. They are as follows:

- Information Request 1: Drivers of Student Outcomes
- Information Request 2: Assessing the Appropriateness of the National Policy Initiatives
- Information Request 3: Assessing the Effectiveness of the National Policy Initiatives
- Information Request 4: Measurement Framework and Performance Indicators

In addition to specific responses to each of these information requests, NSW has the following general comments regarding the NPIs in response to the review. These are discussed in more detail in the following sections.

- NSW considers there is a need to shift the paradigm and ways of working in terms of national education reform. A contemporary approach is required that is focused on a smaller number of NPIs, integrated within a broader reform context and which maximises state flexibility and innovation. This would enable a faster and more agile approach to education reform.
- The current system of NPI development and implementation is not delivering the results we need, despite significant investment of time and funding by all jurisdictions. We need a renewed focus on impacts rather than process, on strengthened stakeholder engagement and on a shared understanding of how an agreed set of reform initiatives will operate together to lift student outcomes.
- The NPIs should be considered holistically, with a sequenced approach to implementation to ensure they are integrated and that schools are not overwhelmed with reform.
- NSW supports continuing a small number of existing NPIs which have a strong potential to improve student outcomes in the future. But we should be clear that these are evidence based, valued nationally and focus on the highest priorities with the most impact.
- NSW notes that on page 6 of the Call for Submissions, the Commission states that it will assess the NPIs against the objectives, outcomes and targets set out in the NSRA. In taking this approach the Commission should be aware that NSW questions this framing of the review of the NPIs. At the time they were agreed, there was no mapping between the NPIs and NSRA objectives, outcome and targets. A line of sight from NPIs to intended impacts would be a positive change.
- Funding is not a consideration for this review, but will be key in the negotiations of the next NSRA. The findings of this review will also likely set the scene for those negotiations. Funding issues are multifaceted and are outside the remit of this review.

In regards to the National Measurement Framework, NSW has the following general comments, which are expanded on in detail in response to Information Request 4.

- The NMF uses measures that are relatively easy to collect, but not necessarily the most informative. It is important that the nationally reported measures are robust and comparable across jurisdictions. Many key factors which affect student performance and wellbeing cannot be measured easily.
- The measures included in the NMF vary in their reliability and robustness, however this is not immediately clear to many users.
- NSW considers that some of the measures in the NMF are not appropriate and do not address areas of concern for some groups of students. There are issues with data collection and reporting for key cohorts, including Aboriginal students, students with a disability and students from a CALD background.

Consultation with Stakeholders

In developing this submission, the NSW Government engaged with stakeholders including the NSW Secondary Principals' Council, Catholic Schools NSW, Association of Independent Schools of NSW, Independent Education Union and the Federation of Parents and Citizens Associations of NSW to discuss their perspectives on the current NSRA. While their views helped inform this submission, the NSW Government submission does not speak for them.

Information Request 1: Drivers of Student Outcomes

Drivers of Student Outcomes

- a. What does the evidence suggest are the key drivers of student outcomes across the three key NSRA domains — academic achievement, engagement, and skill acquisition?
- b. Are there barriers that disproportionately impact outcomes for specific cohorts of students?
- c. Which of these drivers or barriers can governments change or influence?
- d. Have these drivers changed over the past decade or over the life of the NSRA?
- e. Looking forward, are there changes in the external environment or policy context that will affect these drivers?

NSW Research into the key drivers of student outcomes

The NSW Department of Education Centre for Education Statistics and Evaluation (CESE)'s flagship *What Works Best: 2020 update* resources, which are closely linked with the Department's School Excellence Policy, provide a clear evidence base and practical guidance for NSW schools on key drivers of academic achievement, engagement and skill acquisition. These documents have been extensively promoted and are widely used in our schools. The evidence distilled in these publications provides a framework for schools looking to improve their practice. The Department's School Excellence Policy provides direction for schools to lead strategic improvement planning and annual reporting, to self-assess, and to undertake external validation using the School Excellence Framework. Schools undertake self-assessment annually and external validation occurs once every school excellence cycle. Data is captured at the system level.

The school-based drivers of academic achievement and student engagement are intertwined, with both driving each other. There are eight themes within *What Works Best* and all of these have an impact on student outcomes. Strategies to improve student outcomes need to include both academic practices and wellbeing-based focuses. The *What Works Best* resources show that high expectations are linked with higher achievement and performance for all students, especially for students from disadvantaged backgrounds. Students who experience explicit teaching practices and receive effective feedback have greater learning gains and an increased opportunity for achievement. Effective classroom management is also important for creating conditions for learning that minimise disengagement and disruptive behaviour. Higher levels of wellbeing are linked to school completion. All of these insights speak to the importance of quality teaching as an underpinning driver of student performance. It also highlights that key components of the teaching workforce, namely initial teacher education and quality teaching, would be a good focus for national effort.

For the drivers of literacy and numeracy outcomes and school completion, the three factors which have the most evidence linking them to the domains of academic achievement, engagement and skill acquisition are the importance of teachers' high expectations of their students, student engagement and attendance. This is informed both by the findings of *What Works Best* and other research conducted by CESE.

These themes can act as a foundation to understand the drivers of student outcomes by providing key evidence-based strategies to support teachers. However, further research is necessary to ensure teachers and schools have the resources and support to draw upon evidence-based strategies. This presents an opportunity for the newly established Australian Education Research Organisation (AERO), to work in collaboration with state-based evidence and research bodies such as CESE, to provide support to the sector nationally. AERO is well placed to be a source of evidence-based research and alongside other NPIs including the Unique Student Identifier (USI) and Online Formative Assessment Initiative (OFAI), will contribute to improving the availability of quality data.

Linking student outcomes to NPIs

The NPIs would have benefited from being mapped to impacts over a specific period of time. This would have enhanced the effectiveness of the initiatives and provided greater clarity to jurisdictions and stakeholders on what was to be achieved. It is misleading to link student outcomes based on the NSRA domains as is suggested on page 6 of the Call for Submissions and in the first question of information request 1. At the time they were agreed, the NPIs were never mapped to a specific outcome, and the three NPI focus areas do not line up with the NSRA outcome domains.

Instead, effort was directed at acquitting project milestones and completion. This means there is no agreed set of measures about what student outcomes were expected to be influenced, or over which period of time.

Outcomes and Funding

The experience of implementing the NPIs detailed in the NSRA provides an opportunity to strengthen accountability from the Commonwealth, states and territories in a reform agenda through the next school funding agreement.

Mutual obligation would reinforce that the Commonwealth provides appropriate support and funding to states and territories who are school system managers charged with delivering education and implementing the reforms. It would create the conditions to strengthen the alignment between the work of the national companies (except for AITSL, all are jointly funded by jurisdictions) and the shared national priorities.

NSW is concerned that page 7 of the Call for Submissions refers to school funding. NSW notes that matters of school funding require detailed analysis and consideration and are outside the Terms of Reference for this review.

NSW is concerned about the presentation of the PC's argument and framing as any effort to link policy reforms, outcomes and funding carries significant risk.

While mapping initiatives with outcomes is a good thing, NSW does not support any linking of student outcomes to national funding. While all jurisdictions should have an agreed line of sight on the impact of reforms, this does not extend to support for national outcomes-based funding arrangements. Such arrangements have significant potential to entrench inequality and reduce state-based flexibility and agility. We note that performance can also be due to factors outside the school environment. Although it is a contested issue as to which external factors impact performance and to what degree, it is clear that factors like socio-economic disadvantage affect aggregate performance.

Information Request 2: Assessing the Appropriateness of the National Policy Initiatives

Assessing the Appropriateness of the National Policy Initiatives

- a. The NSRA (s. 43) provides some guidance on the nature of national initiatives. Are there other principles that should be applied when identifying NPIs suitable for inclusion in a national agreement? What should these be?
- b. What policy areas are best suited to national collaboration and why? Of those, which are best pursued through the NSRA?
- c. Are there ways to maximise the benefits of national collaboration?
- d. Are the three reform directions — supporting students, student learning and student achievement; supporting teaching, school leadership and school improvement; and enhancing the national evidence base — still the best statement of priorities for reforming schools?
- e. Do the NPIs align well with the reform directions and are they the best opportunities for collaborative reform?
- f. Is there any unfinished business associated with implementing the NPIs that would justify including additional actions in the next national school reform agreement?
- g. Are there other initiatives that would better address key needs or government priorities for schooling?
- h. What policy initiatives (or actions) would be appropriate to include in the next national school reform agreement? Why?

Summary

While it is relatively early in the ‘life’ of the NPI program, the collective potential of the NPIs is not being delivered as anticipated.

The agreed outcomes of the NSRA are aligned to the current NSW policy priorities for evidence-based reform. Many of the NPIs in the original reform had potential to deliver on these shared policy reform directions. However, our experience to date is that the collective potential of the NPIs is not being realised as anticipated.

The need for national consistency and lack of a holistic approach to the NPIs has limited their success

Setting and commencing work concurrently on eight NPIs resulted in a complex national reform agenda. The design and intended outcome from delivery of the NPIs was not effectively articulated and resulted in varied measures of success. Seeking national

consistency in implementation has added to the challenges in delivery of the NPIs. Future NPIs would benefit from clearer outcomes, sequencing of reform initiatives and greater implementation flexibility for individual jurisdictions. While work to understand the costs of the NPIs is still underway, uncertainty around future funding requirements and arrangements is a risk to implementation of the NPIs.

Principles for National Initiatives

Reflecting on the NPIs, the NSRA and the experience of the last four years since the start of the NSRA, four key principles for national effort stand out. They are features of the NPIs which have been most successful, and can be seen as principles for determining shared national policy reform goals for our future work. Our experience to date suggests that the original principles need to be enhanced.

National effort must:

1. **Involve effective and sustainable funding arrangements** – National effort must represent value for money for all jurisdictions – both in terms of the investment of human capital, and funding. Funding should be based on student need, not outcome, and NSW's fiscal and budgetary sustainability, flexibility and autonomy must be protected.
2. **Recognise State sovereignty through strong governance and accountability** – National effort must recognise state sovereignty and allow state and territory flexibility in the delivery of reforms. National work should help accommodate and support state-based collaboration across government and non-government sectors. States and Territories need flexibility to respond to new and emerging issues.
3. **Focus on delivering outcomes through actionable and effective policy reform directions** – National policy initiatives must be evidence-based and deliver tangible and measurable outcomes for students, teachers and schools. We should prioritise policy reforms that address disparity of outcomes for students impacted by disadvantage, students from regional and remote areas, students with disability and Aboriginal students
4. **Focus on the highest priorities which are ambitious for students** - National effort must be focussed on the highest priority issues in education. A pragmatic approach is needed which focuses on a smaller number of NPIs that can be realistically delivered within the context of the broader reform agenda.

Current NSW Education Policy Focus

It is crucial that the focuses and reform directions of the NPIs and NSRA align well to the policy objectives of individual jurisdictions. In NSW, Education continues to be one of the

most important investments for the future with a vision to be Australia's best education system and one of the finest in the world.

The Department has commenced implementation of a range of reforms that are underpinned by the School Success Model (SSM), a whole-of-system, evidence-based reform program that ensures accountability for lifting student outcomes is carried across the Department, delivering targeted support to schools and students.

These initiatives increase targeted support for students and strengthen the government school system as a whole with the explicit goal of lifting student outcomes. The system initiatives include: building the workforce; supporting students and teachers in classrooms through Inclusive, Engaging, Respectful Schools; Curriculum Reform; the Ambassador Schools program; and continuing to strengthen the evidence base and data analytics around school improvement and what works best.

There are also significant NSW policies being developed to support the critical transitions in a student's life from early childhood education to school (for example the Transition to School Digital Statement and the whole-of-government Brighter Beginnings initiative) and pathways from school into further education, training or work (for example the Educational Pathways Program).

Strong potential in several current NPIs

The NPIs have involved a significant amount of effort and resources from Commonwealth, states/territories and non-government sectors since the NSRA was signed in 2018. There have been some notable achievements, including the establishment of the AERO.

We acknowledge that a number of the NPIs have the potential to have a real effect on outcomes, but they need time to fully mature. The NPIs would have benefited from a clearly articulated narrative on expected impacts over time and beyond the life of the current agreement.

This can be seen with AERO, which was successfully established in 2021. It will take time for AERO to build a significant body of research and for that research to flow through to classrooms. This is especially the case given the high level of disruption experienced by schools over the last two years in responding to COVID-19. Schools' capacity to engage with research and change is limited at present as COVID-19 is still impacting school operations. NSW education stakeholders have advised that there is limited awareness of AERO in school communities. Again, this is mostly a result of the stage in AERO's development and the external environment. Whilst there is significant potential for AERO to effectively contribute to evidence-based learning schools, it needs time to develop and communicate and become a trusted source for teachers, students and parents.

The Unique Student Identifier (USI) also has strong potential to impact student outcomes once it is implemented. The USI will make it possible to follow and understand patterns of

student mobility as enrolments will be better tracked. On a system level, the USI has the potential to provide a new, unique and rich data source to inform policy in a way which was never possible before. Future uses of the USI, while not yet part of the national conversation, have the potential to improve understanding of student growth, and enable better support for students to achieve their potential as they move through early childhood, schooling and post-school pathways.

A new paradigm for national reform is needed

The current paradigm is not working well enough and we need new modes of national collaboration. We need to learn from each other, act more quickly, and not pursue national uniformity when it acts as a barrier to reform. In a number of cases NSW has initiated its own response to education priorities to provide timely reform to meet the needs of NSW schools rather than waiting for national initiatives to be developed and agreed. Greater flexibility for states and territories to develop their own response to NPIs would improve the opportunity to achieve delivery of the reform.

An example of this is the limited national progress on the proposed national learner profile which was a recommendation of the review into senior secondary pathways and is one of the NPIs. Ministers decided in 2020 to develop a sample learner profile, however action since has been limited to approving funding to provide further advice to Ministers. Meanwhile, NSW has acted separately to develop its own learner profile, to ensure this important reform is delivered for NSW students in a timely manner.

The Department's learner profile is outpacing the national initiative, with aims to deliver a minimum viable product by the end of 2022. NSW has taken an adopt and adapt approach to the national learner profile, to minimise the duplication of efforts and resources. While an adopt and adapt approach can have benefits, it is preferable to establish it as the agreed approach rather than default to it when faced with slow progress.

COVID-19 has shown that agile reform is needed to respond to emerging issues in education yet the NPIs are high stakes reforms that will take years to develop. In NSW we developed check-in assessments to determine student progress starting in 2020 when NAPLAN was cancelled for that year. We have also developed an intensive learning tuition program to address learning delays resulting from lockdowns and remote learning. National reforms could learn from the agile approaches taken in these state-based initiatives as they respond to new and unprecedented challenges. It shows that an agile approach can deliver a positive change for students in a much shorter period of time if the approach is correct.

NSW considers that a new approach to national reform, with greater flexibility for jurisdictions, is likely to be more successful in the future. National uniformity and consistency should not be our key goal, rather an approach that facilitates national collaboration and sharing.

Fewer NPIs to increase impact

The NPIs in the NSRA outline an ambitious reform agenda, targeting the implementation of eight, wide-reaching national policy reforms across five years to December 2023. Experience so far suggests that there are too many NPIs to effectively develop and deliver in a relatively short period.

While important progress has been made on some of the NPIs, they do not operate in a vacuum and require the broader context of education reform and emerging priorities to be more comprehensively considered. There is an ongoing and significant body of reform work in jurisdictions that is underway alongside the NPIs.

Greater consideration is needed to ensure national reforms are sequenced to ensure systematic and strategic implementation. There are capacity limits to any effective reform agenda, and we must recognise that the NPIs exist within a broader reform and education ecosystem. There are risks of failing to systematically plan, sequence and implement reforms such as spreading resources too thinly and potentially overwhelming schools and school systems with a large volume of change.

Our stakeholders echo these concerns and advise that there must be better consideration of timing and communication to ensure that the schools can cope with the scale of reform, and that teachers and school communities are supported.

NPIs to close the equity gap

Education helps to reduce the impact of disadvantage on people's lifelong outcomes, and the education system's core equity goal is to weaken the link between students being from disadvantaged backgrounds and the likelihood of lower educational achievement. This goal underpins existing national objectives and measures including reducing achievement gaps for students from various SES backgrounds, increasing attendance for equity cohorts, and lifting year 12 or equivalent attainment rates for priority cohorts. National targets must continue to have closing learning and attainment gaps between disadvantaged and advantaged students at their heart – both to achieve the system's equity promise and to improve system performance overall.

NSW notes that the Commission will explore evidence on the extent to which specific NPIs have achieved expected short or medium-term outcomes, including lifting outcomes for equity cohorts. As highlighted above, this approach requires caution as the NPIs were not mapped to specific outcomes or impacts over time. It is also important to evaluate the effectiveness of policy in driving equity by tracking educational opportunity and experience (e.g. equitable access to quality teaching, resources, high expectations), as well as measuring progress towards longer term outcomes-focused goals.

NPIs that are a good return on investment

National initiatives should deliver a strong return on investment for students, teachers and schools. States and territories are incurring significant financial and in-kind costs to fund the design and development of the NPIs but it is not clear that the benefits outweigh the costs. This is further exacerbated by the fact that jurisdictions agreed to the NPIs before detailed costings were determined.

There are many financial risks for states and territories in relation to implementing the NPIs. This includes that the costs for long-term projects go beyond the end date of the NSRA – in particular the USI, OFAI and AERO. While the NSRA is for five years, these NPIs are clearly long-term initiatives that will require continued investment over many years. This also applies to a lesser extent to the improving national data quality NPI, since it has involved long term tests and surveys which also incur ongoing cost. The scope and quantum of these costs, what level of costs are reasonable, and responsibility for how these costs will be covered remains unclear.

Further, costs are incurred not only for national work but also for jurisdictions to undertake their own complementary actions to implement NPIs. For example, the USI is a reform which impacts all States, Territories and non-government education systems. NSW will need to establish comprehensive IT and support infrastructure to maintain the USI on an ongoing basis. At this stage, the costs of the project are not certain going forward and it is not clear how they will be apportioned between the Commonwealth, states/territories and the non-government sector. Feedback from stakeholders has been that these ongoing costs may be particularly acute for the non-government sector.

For many NPIs, costs were also not identified and agreed to at the outset as some were dependent on design decisions such as the USI. Other initiatives such as OFAI have significant but still to be determined cost implications.

These ambiguities are a barrier to long term implementation and success of the reforms. There should be greater clarity on future costs, and greater capacity for future cost benefit analysis to ensure value for money. Conducting a cost benefit analysis on these NPIs would be useful for all parties.

Information Request 3: Assessing the effectiveness of the National Policy Initiatives

Assessing the effectiveness of the National Policy Initiatives

- a. Is there evidence that the NPIs have achieved expected short- or medium-term outcomes (such as States and Territories, schools or teachers using resources produced by the NPIs)?
- b. Are there any major barriers to realising the benefits of the NPIs (including barriers to finalising implementation)? If so, how could governments address these?
- c. Are the NPIs (likely to be) equally effective for all student cohorts, including equity cohorts, or are more tailored measures required?
- d. Taken as a whole, are the reforms set out in the NSRA likely to improve student outcomes in the future?

Summary

Slow progress on NPIs raises questions about NPIs that are suitable for national effort

Work on the NPIs has occurred during extremely challenging circumstances for NSW and many other states and territories, including major floods, bushfires and COVID-19. Many milestones have been reached, and a number of NPIs have been acquitted, but we are largely yet to see a major impact on schools and students directly. In terms of NPI implementation, progress has been relatively slow and success is variable. Some NPIs are yet to be fully implemented, but have a great potential to drive significant positive impacts in future. There are important questions on the types of NPIs that are suitable for national effort or whether agreement is best achieved on strategic directions, with jurisdictions to decide on implementation detail.

This review as an opportunity to establish a new paradigm for national collaboration

A new paradigm is needed for national collaboration that focuses on the highest priorities and achieves outcomes for students, teachers, schools and the wider education community. The new paradigm would be characterised based on the lessons learnt from experience so far.

Key barriers to address in future arrangements include: establishing revised timeframes recognising the current context; maximising the opportunity of collective impact of reforms across NPIs; prioritising stakeholder engagement in design and implementation;

and ensuring a strong focus on the desired impacts on educational outcomes and equity outcomes.

These barriers could be addressed through a tighter policy focus.

This policy focus will need to be carefully scoped, focused on impacts, designed as an overall set of complementary reforms, and have stakeholder engagement built-in.

Specifically, there should be a deep and narrow focus on two policy areas to maximise impact. Suggested areas are strengthening the national evidence base and improving teaching quality.

Slow Progress

The design of the NPIs must include clear considerations of what is practically possible within given timeframes. This means building in more realistic timeframes, including approval times within individual NPIs, considering the number of NPIs, and considering where adopt and adapt approaches might be more appropriate than pursuing national consistency.

We acknowledge that a number of the NPIs are significant reforms and have the potential to have a real effect on outcomes, over time. The USI is one such example that has the potential to provide valuable data for teachers, schools and systems. However, taken collectively, national initiatives should be shifting the dial in a positive direction more quickly. Too many NPIs have either been delayed or are currently not on track. NSW's external stakeholders have also expressed concern with the extended timelines of these projects, noting the need for immediate reform to address new and emerging challenges facing education.

Many of the initiatives have had periods where there have been delays in seeking national decisions due to the need to reach national consensus on a range of complex design, development or implementation issues. While it is important for all jurisdictions to work through the complexity of the issues, and allow time for stakeholder consultation, negotiations for a consistent or uniform national approach take time to resolve and can impede fast responses to known problems.

Given the delays with some national projects, NSW has needed to act sooner in introducing our own similar initiatives, such as the development of a learner profile and formative assessment. The result of the disconnect in timing between national and state-based reform is that resources are spent on overlapping projects, and the potential benefits of collaboration are lost. This raises important questions about the types of policy initiatives that are appropriate for the national level or whether national agreement should be around strategic directions, with implementation detail to be at jurisdiction level.

The potential for collective impact of the NPIs has been lost

A more holistic approach to the NPIs, as was intended at their inception, would have better supported their design and implementation. A connected set of reforms with a sequenced approach for implementation that considers the broader education landscape and the impacts on schools would have been a more strategic and pragmatic approach.

Although the vision of the NPIs was as part of a broader research agenda which underpinned the NSRA itself, in practice the NPIs have been developed in silos. The goals of the individual NPIs, and the corresponding milestones, are often unrelated.

Implementation has at times reflected the disjointed nature of the NPIs. Although there was an agreed set of milestones, the timing of them was lacking in detail, and not really coordinated to maximise impact or to minimise disruption for schools. This issue has worsened as the timelines have changed, which as previously noted has happened several times.

This is significant in the context of the *Through Growth to Achievement* review, headed by Mr David Gonski AC, which informed the NPIs in the NSRA. The review proposed a number of recommendations which it says “*are an integrated package, not discrete ideas to be adopted in isolation*”. In practice, however, only a subset of those recommendations has been adopted, and the mode of development and implementation of these has in effect been as separate projects shared across jurisdictions and national bodies. The anticipated benefit of an integrated package of coherent, mutually-supporting reforms has been diminished and the cohesion of the package has not been achieved.

COVID-19 and natural disasters have had a significant impact

The challenge of realising the National School Reform Agreement’s ambitious policy reform agenda was also compounded by the sudden and emerging challenges of the COVID-19 pandemic, bushfires and floods. All jurisdictions pivoted to respond to the unique challenges of these historic events. In NSW, this meant prioritising continuity of learning for students in online and remote settings. The practical impact of bushfires, then COVID-19 and then floods cannot be overstated. The capacity for schools and teachers to implement reform has been very limited due to the extreme demands put on them. It is clear that in this extraordinary context that there were too many NPIs and this impacted how effective they could be as a whole. Given COVID-19 will continue to challenge education systems and schools for some time, and natural disasters are likely to occur again, the scale and scope of national reform will need to respond to the impacts of these disruptions.

Stakeholder engagement must be prioritised

Stakeholders have advised us that they have very limited visibility of national reforms and what is being achieved. They are seeking increased communication and visibility more broadly, to allow for schools, teachers and parents to be kept up to date. Previously effective processes, like post-national meeting communiques, have effectively ceased since the Conran Review changes were implemented to the national architecture.

There is a need for greater stakeholder involvement in the development of national reforms from scoping and design through to development and implementation. This will not only facilitate stakeholder buy-in but improve the design of reforms through the experience and knowledge that education stakeholders bring to the table. The nature and pace of change has often made this very difficult. Individual jurisdictions have often been given short notice of new developments with NPIs, and this has made it very difficult to engage with stakeholders. There have been very limited national-level stakeholder engagement activities.

Engagement with Aboriginal and Torres Strait Islander representative groups is particularly important to ensure the NPIs are effective in supporting improved educational outcomes for Aboriginal students. More effective parental engagement has also been identified as an issue. There has been some limited parental engagement with key projects like the USI through research. However, it hasn't been embedded in the approaches to design and development of other national reforms.

Stakeholder engagement is a vital part of the national reform journey in providing a line of sight from the concept phase through to implementation – particularly the impacts on schools, teachers, students and parents. A clear and deliberate approach to stakeholder engagement would have greatly helped the implementation of the NPIs.

There have been achievements with some NPIs, but others have had barriers

As noted throughout this submission, there have been some significant achievements such as the establishment of AERO. This achievement should not be understated, especially considering the extremely difficult implementation environment created by COVID-19.

However, some NPIs have experienced barriers. The complexity of negotiating the design and development of major IT projects has been a significant barrier. The slow pace of national work has also led to NSW conducting similar work unilaterally more quickly. Others, like the teacher workforce strategy have run into barriers in terms of articulating a strategic narrative for change.

NPIs were not designed to consider the specific needs of different cohorts

The NPIs have not been designed to consider the needs of specific cohorts or equity groups so it is difficult to comment on their impacts at this level. They were designed as high level, system wide initiatives. The goals and milestones of the NPIs were also designed in the same way.

It is possible that some NPIs are impacting different cohorts in different ways, for example the Senior Secondary Pathways Review focused more on older students. However specific focus on cohorts was not a feature of the NPIs.

Information Request 4: Measurement Framework and Performance Indicators

Measurement Framework and Performance Indicators

- a. Does the performance reporting framework in the National School Reform Agreement (NSRA) embody the 'right' mix of objectives, outcomes, targets and sub-outcomes for inclusion in a future agreement?
- b. Do the objectives, outcomes, targets and sub-outcomes in the NSRA align with the aspirations set out in other key documents such as the Alice Springs (Mparntwe) Education Declaration?
- c. Does the Measurement Framework for Schooling in Australia provide a relevant, reliable and complete picture of progress towards achieving the outcomes of the NSRA?
- d. Are there performance indicators not included in the Measurement Framework that would help provide a more relevant, reliable and complete picture of student outcomes, both as identified within the NSRA and more broadly?
- e. Are there impediments to governments adopting these indicators (for example, data availability, cost)?
- f. What are some current or planned national data projects that might be relevant to measuring progress against the outcomes of the NSRA?

Measures included in the National Measurement Framework (NMF) have helped focus policies and programs on key national goals

The NMF has driven greater consistency across schools and systems in reporting data. NSW welcomes the publication of school level data on the ACARA My School website as a valuable tool for the public.

It is important that the nationally reported measures are robust and comparable across jurisdictions. For example, the NSW Department of Education refers to the measures in the NMF when developing metrics of school or system performance, indicating that the NMF helps with focussing the Department's policies and programs. However, some of the measures were collected before the establishment of the NMF, and the Department would have referred to this data even if the measures had not been included in the NMF. This means that there are mixed views about whether the NMF has helped focus policies and programs. Measures such as the proportion of students in the top two NAPLAN bands for

reading and numeracy are included as NSW Premier's Priorities and have driven policies and initiatives across NSW schools.

Measuring student participation, student achievement and student attainment is a complex activity and the measures included in the NMF vary considerably with respect to their reliability and frequency of measurement. Some data reported in the NMF - such as NAPLAN - is a snapshot of achievement on one day, while other data is based on sample surveys (e.g. the ABS Survey of Education and Work). Even data that is collected daily such as attendance data requires complex validation and correction to report consistently, with jurisdictions operating under different legislation with varied categories of attendance and absence. This means that the correct interpretation of measures in the NMF requires an understanding of the specific collections and their limitations and appropriate contextual information.

Users require a nuanced understanding of the strengths and limitations of data

The measures included in the National Measurement Framework vary in their reliability and robustness, however this is not immediately clear to many users. There is currently no guide to the reliability of any of the 38 indicators on the Key Performance Measures for Schooling in Australia dashboard. As the measures themselves are complex, efforts to make them clear and concise risk undermining accurate and nuanced understandings of the data.

Each data source used in the NMF has its own specific limitations. For instance, the ABS Survey of Education and Work (SEW) is used for measures related to the proportion of 15-19, 20-24 and 17-24 year-olds in education and work (measures 1 g – i). The SEW has a target sample of approximately 23,600 dwellings each year, taken from all jurisdictions and across 15-74 year olds. Once data is disaggregated by state and for the specified age cohorts, these estimates are produced from relatively small sample of individuals, and are subject to greater margins of error. Self-report measures such as SEW and the Census also have limitations regarding accurate reporting of data regarding complex variable definitions. Other measures, such as NAPLAN and attendance, have had significant breaks in series in recent years, which need to be considered when interpreting data. While footnotes provide high level information on limitations, these can be inadequate to understand the full extent of the limitations.

New national data collections need time to stabilise before being publicly reported and care must be taken that the first year of published data is sufficiently reliable and valid for use as baseline in reporting. The Nationally Consistent Collection of Data on School Students with Disability (NCCD) is an example of managing this stabilisation period. In the first full year of implementation (2015), states and territories identified that there were significant inconsistencies in how schools interpreted the key concepts of *level of adjustment* and *type of disability*. This resulted in several research and professional

learning programs to improve consistency of teacher judgement, some of which are ongoing. Due to the limitations of this data set, only population information on students who receive adjustments due to disability is currently reported through the NMF, with no disaggregation by disability available for other performance measures.

Users require contextual information to accurately interpret data

In addition to knowing the technical information about the measures included in the NMF, there is a need to understand variations in policy and initiatives between jurisdictions and across time to correctly interpret NMF data. While NSW welcomes the inclusion of both year-on-year and long-term trends on the Key Performance Measures for Schooling in Australia dashboard, we note that some data is currently provided without adequate context, particularly if users navigate directly to the dashboard. For example, Western Australia has a much smaller decline in NAPLAN participation between Year 3 and Year 9 than other jurisdictions. This is because WA students are incentivised to sit the test. Those who achieve Band 8 or above in Year 9 NAPLAN do not need to pass an online literacy and numeracy assessment to be awarded a Year 12 certificate.

Educational outcomes are achieved over many years of schooling, so the impact of educational change can take a long time to flow through to nationally reported measures. Student attainment - measured at the age of 20 to 24 - is included in the NMF, however as these measures are only reported from ABS census data every 5 years, they often receive less attention than measures which are updated annually (e.g. NAPLAN and attendance).

Where some measures receive less attention than may be warranted, in other cases the publication of specific measures may attract undue attention. In recent years results from the OECD Programme for International Student Assessment (PISA) have received significant media attention, and have been used to criticise Australian education systems. While PISA is a valuable tool for understanding Australia's position relative to other countries, substantial variation in sample size and selection methods means that comparisons need to be made with caution. As with other datasets, this issue is exacerbated if the analysis is narrowed to specific education systems (government, independent and catholic) within states or territories.

Annual reporting of trends without appropriate contextualisation and in a deficit format can overshadow small gains made in large-scale problems. For example, the COVID-19 pandemic may have impacted on student wellbeing, engagement and achievement, and a global financial crisis may impact on young people's choices to engage in post-school education in ways that are beyond the immediate influence of school education systems. It is important to provide this context in an accessible way whenever measures are reported.

Research studies are essential to inform national performance reporting, and to assist in the development and refinement of measures. NSW considers that it would be better to

have a small number of high-level measures that are published with appropriate context, including explanatory text about data trends and information on relevant initiatives and programs from each jurisdiction. This could be supplemented over time by links to research carried out by education systems, supported or coordinated by the AERO.

A focus on NMF measures may divert attention from unmeasured, but important, factors

NMF measures are an important metric but other key factors not included affect student performance and wellbeing and are not easily measured. Research studies are essential to inform national performance reporting, and to assist in the development and refinement of measures. Rather than adjusting the indicators, it would be better to have a small number of high-level measures that are published with appropriate context, including explanatory text about data trends and information on relevant initiatives and programs from each jurisdiction. This could be supplemented over time by links to research carried out by education systems, supported or coordinated by AERO.

New measures should be cost-effective to collect and not pose additional burden on schools

Wherever possible, existing administrative data should be used. The (NCCD) was introduced in 2015 and has resulted in significant extra work for all schools. However, this is justified as the NCCD is used to allocate funding for students with disability. It is unlikely that any new measures would have such a direct link to school funding, so any new national collection should either involve only a sample of schools or should rely on administrative data that is already collected.

There is ongoing interest in reporting measures of student wellbeing, however there is currently no national survey which collects appropriate data. NSW has an established survey – Tell Them From Me (TTFM) - which provides schools with timely information on student wellbeing. Other states and territories use multiple different instruments to measure student wellbeing, which presents a significant challenge for the development of a single national measure. Developing a national wellbeing measure is likely to impose an additional burden on schools for data collection, and risks data being used to produce league tables, similar to the existing issues that have been faced with NAPLAN data. AERO is best placed to lead work on student wellbeing measures.

Current measures such as the National Assessment Program (NAP) have also added additional administrative load to schools. This could be addressed by adopting a single common testing platform for all national assessments, rather than the current need to install new software each time.

Consideration should also be made as to whether all measures previously used are still required as each new measure poses an additional load on schools. As additional ones are added, consideration should be given to whether any others can be removed.

NSW notes that the NMF does not currently include a measure for student growth or adequately measure early childhood education or post-school attainment.

Any future revision or expansion of key performance measures would require extensive consultation to ensure that the right metrics are chosen. If new measures were proposed as part of the review, NSW would require concrete detail of specific measures that were being considered in order to consult with internal and external stakeholders and provide meaningful feedback.

Measures are not appropriate and do not address areas of concern for some groups of students

Goal 1 of the Alice Springs (Mparntwe) Education Declaration is that *the Australian education system promotes excellence and equity*. The National Measurement Framework is key to reporting on this aspect of the declaration, which is recognised in the framework:

For reporting purposes, measures are disaggregated, where possible and appropriate, by state and territory, Aboriginal and/or Torres Strait Islander (Indigenous) status, sex, language background, geographic location, socioeconomic background and disability.

This focus on equity is not fully realised in the NMF. While the measures can generally be disaggregated by state and territory, sex/gender and geographic location, some measures such as NAP sample surveys cannot be disaggregated for Aboriginal and/or Torres Strait Islander students, which limits the utility of the measures. While outcomes for all students can be compared across jurisdictions, this is not possible for Aboriginal and/or Torres Strait Islander learners.

The framework does not currently contain any culturally responsive metrics to best assess our Aboriginal and/or Torres Strait Islander learners. The declaration also commits the Australian Governments to work in partnerships with young Australians, their families and the broader community but no metrics are included to report on these partnerships. This means that, particularly for Aboriginal learners, the current framework does not provide a balanced or full story of student and community achievement.

Students with disability are listed in the NMF as a key equity group however reporting outcomes for this equity group is not yet possible. Data from the NCCD has been collected from all schools since 2015 but the data is not yet consistent across jurisdiction and sector. In addition, reporting student outcomes using NCCD data requires student level data to be linked to outcomes such as NAPLAN and Year 12 awards. The rollout of the USI over the

next few years has the potential to make this level of reporting possible, provided that data is available from non-government schools as well as government schools.

Language background is listed as a key equity group however English language proficiency is more important than language background, especially for student outcome measures. Students from a language background other than English are diverse, including both newly arrived refugee students with no English skills through to high achieving students enrolled in NSW selective high schools and opportunity classes. ACARA convened a working group in 2020 to investigate the approach used across schools and systems to identify and support students with English language proficiency. This group concluded that differences in methodology across states and territories would require significant resources to develop a nationally consistent approach suitable for national reporting.

Next Steps

NSW acknowledges the importance and value of this review. It is important that the review and its findings be robust and evidence based to help inform positive reform in the future to better student outcomes. NSW also acknowledges the opportunity presented by the Call for Submissions to contribute to such important work.

The NSRA, the NPIs and the NMF are significant and complex. This submission represents the beginning of a process and relationship as the review is conducted. NSW would welcome any opportunity for ongoing engagement and conversation, in order to provide further feedback and input.