National School Reform Agreement
Final Submission

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Introduction

The Association for Language Testing and Assessment of Australia and New Zealand (ALTAANZ) welcomes the opportunity to respond to the Productivity Commission's Review of the National School Reform Agreement Interim Report.

The *Association for Language Testing and Assessment of Australia and New Zealand* (ALTAANZ) promotes best practice in language assessment in educational and professional settings in these two countries and fosters collaborations between academia, schools and other agencies responsible for language testing or assessment. We provide advice on assessment to public and other relevant agencies on assessment-related issues, and advocate on behalf of test-takers, students and other stakeholders whose life chances may be affected by assessment-related decisions.

Members of ALTAANZ have expert knowledge about English Language Proficiency (ELP) solutions around the world. ALTAANZ has members who have participated in world-leading developments of English Language Proficiency (ELP) tools for school-aged learners in Australia since the 1990s. We understand the specific steps taken over time to include the diverse English as an Additional Language/Dialect (EAL/D) learner groups not explicitly catered for in earlier tools. Likewise, the developments designed to adapt ELP tools to facilitate use by classroom teachers not just EAL/D specialists.

We are confident that the Commission will receive extensive support for the addition of EAL/D students as one of the priority equity groups in the next Agreement. However, there are concerning knowledge gaps in the Interim Report regarding provision of better visibility of outcomes for EAL/D students in a revised National Measurement Framework. In our view the Commission needs to expand the source of its information about the relevant policy variables, or risk possible stalling of this important and overdue policy reform initiative. ALTAANZ would welcome the opportunity to talk about ELP issues relevant to the Commission's proposals for the next NSRA.

The ALTAANZ submission responds to the Commission's request for further information in two sections:

(3) Lifting Student Outcomes, where we resoundingly support adding the full cohort of EAL/D students as a priority equity cohort in the next School Reform Agreement.

(7.2) Proposed sub-outcomes under the future agreement, where we put forward a staged process to drive forward reporting on and supporting EAL/D learners as a priority equity cohort (and avoid stalling):

1) **A co-ordinated national approach to EAL/D:** The Australian government coordinates a national approach to including information about all EAL/D learners as a priority equity cohort. This addresses the national policy hiatus on EAL/D learners. A national approach is doable, but it must involve English language proficiency experts experienced with the full EAL/D learner cohort and their diverse learning contexts.

2) **Compile existing EAL/D data:** The Australian government brings clarity to national EAL/D learner data (e.g. numbers of students, language backgrounds, levels in macroskills) by collecting data from the States/Territories/Sectors, drawing from their well-established EAL/D data-collection methods using their existing ELP tools with their current, differing EAL/D cohorts.

3) **Data analysis and evidence evaluation:** Experts in school-based ELP assessment with significant experience representative of the full EAL/D cohort would examine jurisdictional data, to report on the comprehensiveness of the collected EAL/D data set. The full cohort includes, Aboriginal and Torres Strait Islander EAL/D learners who speak a traditional language, a new contact language or a "heavy" Aboriginal English; other children born in Australia where English is not spoken at home; immigrants with different visas, students with refugee or refugee-like backgrounds; international students studying in Australia; children of signing deaf parents etc. A report on

comprehensiveness would encompass whether all likely learner groups are identified equally well, the nature of the evidence base for the ELP proficiency levels assigned in each macroskill (i.e. speaking, listening, writing and reading) and the alignment of the different ELP tools. On the basis of this data, effect data is established through correlations with other variables such as achievement data, English language learning support, curriculum provisions, location etc.

4) **Positive educational actions:** With the focused EAL/D (effect) data and in collaboration with EAL/D specialists with experience across EAL/D cohorts and contexts, the Australian government sets equity group actions and responses, such as:

   i.   Develop a suite of EAL/D language curricula across all ages (early years, primary, high school, senior years - including a matriculation subject);

   ii. Provide guidance about optimal EAL/D learner progress over time that is sensitive to learner background and learning context;

   iii. Recommend EAL/D support at various proficiency levels.

EAL/D students as an additional priority equity group

A national leadership initiative to include EAL/D students as a priority equity group is long-delayed, and is unequivocally necessary for tackling a lack of equity in student outcomes. Clearly, it should not be necessary to state that students with early levels of English language proficiency (ELP) skills will need specific English language support to access and achieve across all the classroom curriculum areas delivered in the English language. It is difficult to imagine a more clear-cut case of educational inequity: classroom content delivered in precisely the language this student cohort does not yet know, perhaps with no targeted English language teaching or English language support whatsoever. The EAL/D learner cohort currently suffers under a historical legacy of non-existent, inconsistent and/or biased policy and programs. Coherent and inclusive EAL/D learner identification, assessment and achievement data sets do not exist precisely because this learner group with its learner characteristics (English language proficiency) have not been prioritised as an equity cohort. Consequently, thoughtful targeted policy and associated accountability measures which capture the full cohort of EAL/D learners (Indigenous and overseas

backgrounds) are urgently required. There are existing building blocks for this work, but serious, problem-solving conversations with experienced language proficiency assessment experts need to occur so these can be made fit for purpose, thus avoiding gaps and pitfalls which could further marginalise or exclude some groups of EAL/D learners and/or misdirect educators and/or support interventions.

Statements in Initial Submissions to the Commission from the Australian Curriculum Assessment and Reporting Authority (ACARA) and from the Australian Education Research Organisation(AERO), key education entities, provide justification for such an initiative:

- ACARA (sub.45) reports that NAPLAN disaggregation by Language Background Other than English (LBOTE) does not correlate with a student's English language proficiency.
- AERO (sub. 6) notes that the significant impact of English language proficiency on educational outcomes has been recorded.[1]
- AERO (sub.6) points to the need to widen our understanding of the impact different initiatives are having on equity groups at a national level.

Indeed, the LBOTE category is known to be a category of misrecognition, a data point which actually obscures the category it might be thought to illuminate, namely EAL/D learners and their language learning needs (Lingard et al., 2012). The use of the LBOTE category for disaggregating NAPLAN results has 'invisibilised' students who are EAL/D learners and their need for English language support. This is particularly vexing for students who are early in their English language development because of the stark difference between their English language proficiency and that of fully English speaking students. Information about this has been disseminated widely in submissions to government inquiries and in research papers since 2010 (e.g. Language Perspectives, 2010; ACTA/ALAA/ALS, 2010; Angelo, 2013; Dixon & Angelo, 2014; Creagh, 2014, 2016; Macqueen et al., 2019).[2]

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[1] Citing Gonski et al. (2011). *The Review of School Funding – Final Report*

[2] For a very recent example of 'invisibilisation', we cite the recently published *Writing development: What does a decade of NAPLAN data reveal?* (AERO 2022). This the first Australian large-scale longitudinal analysis of student writing achievement in specific writing skill areas. The dataset analysed in this project included over 10

Visibility of outcomes for the full cohort of EAL/D students in a revised MFSA

Bringing clarity to national EAL/D data

Given that EAL/D learners should be designated as a priority equity cohort, the Commission cannot access an existing national data set for the full EAL/D learner cohort with which to begin its EAL/D Initiative. There has never been a consistent and ongoing *requirement* for schools and jurisdictions to report data on the EAL/D cohort. As a result, the current national data on the number and nature of EAL/D learners is messy to non-existent. Bringing clarity must be one of the focuses of an EAL/D Initiative. The number of EAL/D learners needing English language support in schools throughout Australia has been estimated at 600,000 (NSRA Interim Report, p. 20 fn 17). This number is probably an under-estimation, since on-the-ground identification and assessment tends to occur when linked to extra funding or support for schools or individuals - and eligibility for such programs has not included the full EAL/D learner cohort. For example. Aboriginal and Torres Strait Islander EAL/D learners and other Australian born EAL/D learners have often not been eligible or considered for targeted EAL/D funding. The long-term absence of any national initiative to gather and consolidate meaningful data on who and where EAL/D learners are means that it is not possible to present clear and accurate national data about EAL/D learner numbers. Rather, various indirect "ersatz" methods are applied to guestimate their existence (e.g. immigration levels, LBOTE in NAPLAN reports, Disadvantaged LBOTE in the ICSEA).

The fact that national literacy data does not effectively discern EAL/D learners in need of support means that national literacy reporting is always too blunt to direct resourcing and capacity where it is needed. Bringing clarity to data about EAL/D students as a priority equity group would mean that national literacy data could be effectively disaggregated for EAL/D learning needs. Bad data on EAL/D students

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million NAPLAN writing results from 2011 to 2021 and 366 samples of students' NAPLAN writing. Disaggregation of EAL/D learners as a priority equity cohort would have enabled AERO to analyse patterns of strengths and weakness in students learning English as an additional language or dialect and coming from a regional, rural or remote area - a step AERO recommends for further analysis of writing data to maximise instructional value (see AERO 2022, Rec 5, 5a).

could become useful data, with the potential for a positive rather than a negative impact. A current criticism is that a sizeable proportion of what is taken to be data about *literacy* needs, is in fact that of *language* needs. NAPLAN tests and reports on reading, writing and language conventions for all Australian school children *as if they already speak English* and are simply adding English literacy. For all the EAL/D learners across the country (who are not disaggregated from full English speakers), NAPLAN results are positioned as "literacy" needs, no matter how much or how little of the English language a student brings to the task. And "literacy-as-if-you-already-speak-English" needs are then addressed with literacy-as-if-you-already-speak-English programs, which fail to get to the actual *English language learning* needs (e.g. Angelo 2012, 2013). So, the cycle of 'invisibilising' EAL/D learning needs can be perpetuated.

Aboriginal and Torres Strait Islander EAL/D learners are part of a diverse cohort of EAL/D learners, and a group who would benefit from explicit initiatives to identify the full EAL/D cohort and bringing greater clarity to EAL/D data sets. At this stage, although belonging to a priority equity group, as with other EAL/D learners, there has been no initiative to disaggregate Aboriginal and Torres Strait Islander learners' outcomes by EAL/D status or English language proficiency level. This is truly a huge oversight and highly inequitable, as the entire population of remote communities often speak a traditional or new contact language as their vernacular, so all children are predictably EAL/D learners. Low NAPLAN scores are misunderstood as literacy issues, and so they can be subjected to an array of inappropriate (misdirected, ill-informed and often expensive) literacy interventions in an effort to lift "educational" outcomes, or at least NAPLAN scores. These distract or even block teaching through language methods (EAL/D, first language, dual language: using both modes) which make the curriculum accessible and engaging. Because EAL/D has not been foregrounded by the Commonwealth as an equity issue, it is not on the intervention menu in schools.

Feasible ways forward in data collection

We recommend that the revised MFSA should consider using the well-established methods that States/Territories/Sectors have of collecting and reporting on EAL/D

data, at least initially (see staged plan I-IV). A revised MFSA should not be constrained (and delayed) by only using nationally comparable data sets where these do not yet exist (see NSRA Interim Report, p. 196). The advantage of drawing on existing jurisdictional methods is that, despite limitations on comparability, reliability etc., States/Territories/Sectors could be required to report nationally on their existing EAL/D data sets within a very short time frame. In terms of responding expeditiously to students' EAL/D learning needs, the pragmatic solution is preferable to the 'search for the holy scale'[3] alone – useful though it would be. The MFSA would receive considerable data on the EAL/D priority equity cohort on which to report, and long overdue policy steps could be taken to respond to the language learning needs of this cohort. Data on like State/Territory/Sector tools and like contexts could be compared (by ELP assessment experts with experience of all EAL/D cohorts).

Australia has been a world leader in the assessment and testing field in developing English language proficiency tools for school-aged learners. Some Jurisdictions/Sectors have developed and are using their own English language proficiency tools, which are sensitive to their educational contexts and their own EAL/D cohorts. ACARA has produced its own tool, used by some jurisdictions, which in our view requires considerable re-thinking in terms of the levels of English proficiency it describes. In other words, the ACARA tool is not a ready-made solution in its current form. Well-informed English language proficiency experts with experience across different EAL/D learner cohorts could assist in this matter if required.

There are numerous groups of EAL/D learners who have been not been consistently included in EAL/D services and programs, and hence in EAL/D tools. For national data gathering, experts in English language proficiency assessment with school-aged learner cohorts of diverse backgrounds are best placed to advise on how to include the heterogenous circumstances and backgrounds of the full EAL/D cohort. The barriers for EAL/D learners to accessing curriculum delivered through English vary along many parameters, but pivotally according to the level of English language

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[3] The phrase comes from the late Bernard Spolsky, renowned educational linguist and 'seminal voice' in second language proficiency testing, in *Measured Words* (1995).

proficiency. Other factors that influence their English language learning trajectories include:

- whether they have experienced comparable **schooling and curriculum and literacy learning in their first language**;
- whether they have been or are being **explicitly taught the English language** (in contrast to just being submersed in it);
- whether their current English language learning context includes **using English outside of the classroom** with their peers, in everyday life etc (for example most remote Aboriginal and Torres Strait Islander communities use their own languages for everyday life, English is encountered almost exclusively in the classroom);
- whether their **first language is recognised as separate from Standard Australian English** (for example, for speakers of new contact languages, learners and their teachers often need extra awareness strategies to untangle the linguistic overlaps).

Research on English language proficiency tool validation needs to be treated with caution in some cases, because it may not be representative of the full cohort. Angelo and Hudson (2020) note that the population of overseas background EAL/D learners generally occur in different areas from Indigenous background EAL/D learners. These groups are in complementary distribution with more overseas background EAL/D learners in urban areas, southern states/regions. Thus, the different identification, teaching and learning and assessment contexts of particular groupings of EAL/D learners may not be addressed if a single readymade EAL/D data collection tool or process is selected for national use without due consideration.

A national requirement for States/Territories/Sectors to report on their EAL/D data would provide cross-jurisdictional evidence to be examined and reported on by experts in English language proficiency assessment with diverse school aged learner cohorts. We strongly suggest a staged process, described below (reproduced from introductory statement):

1) **A co-ordinated national approach to EAL/D:** The Australian government coordinates a national approach to including information

about all EAL/D learners as a priority equity cohort. This addresses the national policy hiatus on EAL/D learners. A national approach is doable, but it must involve English language proficiency experts experienced with the full EAL/D learner cohort and their diverse learning contexts.

2) **Compile existing EAL/D data:** The Australian government brings clarity to national EAL/D learner data (e.g. numbers of students, language backgrounds, levels in macroskills) by collecting data from the States/Territories/Sectors, drawing from their well-established EAL/D data-collection methods using their existing ELP tools with their current, differing EAL/D cohorts.

3) **Data analysis and evidence evaluation:** Experts in school-based ELP assessment with significant experience of the full EAL/D cohort would examine jurisdictional data, to report on the comprehensiveness of the collected EAL/D data set. This would encompass whether all likely learner groups are identified equally well, the nature of the evidence base for the ELP proficiency levels assigned in each macroskill (i.e. speaking, listening, writing and reading) and the alignment of the different ELP tools. On the basis of this data, effect data is established through correlations with other variables such as achievement data, English language learning support, curriculum provisions, location etc.

4) **Positive educational actions:** With the focused EAL/D (effect) data and in collaboration with EAL/D specialists with experience across EAL/D cohorts and contexts, the Australian government sets equity group actions and interventions, such as:
    i. Develop a suite of EAL/D language curricula across all ages (early years, primary, high school, senior years - including a matriculation subject);
    ii. Provide guidance about optimal EAL/D learner progress over time that is sensitive to learner background and learning context;
    iii. Recommend EAL/D support at various proficiency levels.

Identifying the full cohort of EAL/D learners

An essential policy step, after adding the EAL/D cohort as a priority equity cohort, is to *require* jurisdictions and sectors to *identify* the full cohort of students with English language learning needs. The historical legacy of the long national policy hiatus is that the full cohort of EAL/D students is under-identified.

The numbers of Indigenous EAL/D learners are likely to be greatly underestimated. This cohort has not been eligible for EAL/D programs revolving around immigrant language backgrounds or visa categories; and where this has been the primary process for identifying EAL/D learner status, they have been bypassed. Another mechanism used for identifying potential EAL/D learners is enrolment data about main language other than English spoken at home. Here too, Aboriginal and Torres Strait Islander EAL/D learners can be overlooked. Language contact and shift processes resulting from Australia's invasion and colonisation history have created a complex language landscape, including new Indigenous contact languages. Some of these new contact languages have the largest numbers of speakers of any Indigenous language, but their recognition is variable and nomenclature is often problematic. These EAL/D learners need to be identified by teachers in classrooms (Angelo 2013; Angelo & Hudson (2018, 2020); Hudson & Angelo (2014, 2020).

There are many issues related to language shift which require examination and due policy direction and care. Although Aboriginal and Torres Strait Islander language communities are front of mind in this regard, language contact processes are not experienced exclusively by them. Another situation where EAL/D learners are not necessarily identified is Australian born immigrant/refugee background EAL/D students where English is not spoken at home. Their family may enrol them as English speakers because they have some English proficiency, but their opportunity to learn and use English is not nearly as extensive as children from English-speaking households. Such EAL/D learners might therefore also be reliant on teachers to recognise their EAL/D learning needs and identify them, so that they receive extra EAL/D support. Clearly a national initiative to add EAL/D students as a priority equity cohort would go some of the way to shining a light on the role of English language proficiency in schooling, with a view to better recognising and including some of the excluded or less well-served EAL/D learner groups.

Some States/Territories/Sectors have developed dual-pathway Identification tools to capture the full EAL/D learner cohort, either through enrolment processes (e.g. demographic data such as visas, language(s) spoken at home) or to be supplemented by identification by teachers in classrooms. These could be shared in a national collaborative initiative.

Concluding statement

In sum, a national initiative to add EAL/D learners as a priority equity cohort is key to recognising one of the most fundamental sources of inequitable access to schooling. English language proficiency is the means by which students access, engage and achieve in schooling delivered via the medium of English language, the majority of classroom situations in Australia today. Students who are in the process of learning the English language in addition to their first language(s) have EAL/D learning needs that can and should be addressed to optimise their school learning outcomes.

Currently the full EAL/D learner cohort is invisible in national data. This has resulted in a policy, program and curriculum vacuum. States/Territories/Sectors have existing but varied ELP tools and EAL/D processes and services, which have variably included EAL/D learners of different backgrounds. We urge that this information can and should be harnessed to establish initial baseline EAL/D data because there is no single tool ready to be implemented nationally at this point and a legacy of biased inclusions and exclusions. We recommend that ELP assessment expertise with experience across diverse EAL/D cohorts examine and report on this baseline data, to hasten its usability for effect studies, and for steering much needed accountability for EAL/D learner equity, and long-awaited improvements in the areas of curriculum, services/programs and policy.

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