APPA’s response to the Productivity Commission’s Draft Report:

National Education Evidence Base

The Australian Primary Principals Association (APPA) welcomes the Productivity Commission’s draft report and acknowledges its draft recommendations.

In response to the invitation to exam the draft report and provide a written submission, APPA offers the following:

1. APPA is supportive of the concern raised in the draft report about adopting and applying an evidence-based approach for the allocation of resourcing. The observation that competition is not a successful driver of improving student outcome is also supported.
2. The Commission has clearly defined the difference between data and evidence. This provides a good starting point for the discussion on what constitutes an evidence-based led education system and school.
3. APPA would suggest adding to the evidence collection is the rising number of schools using student portfolios and work samples to demonstrate learning outcomes.
4. The drivers of improved student outcomes are clearly outlined as part of the framework for an education evidence base, and APPA would welcome an increase in the resources to support the evaluation of what works and the dissemination and application by educators and policy makers. There is a strong call for ensuring the collection of evidence has a clear purpose, cost benefit and educational advantage for school teachers and leaders.
5. APPA strongly supports the commissions comment that, “*Measuring and monitoring performance does not automatically lead to insights as to what policy and practice can do to help students to learn better, teachers to teach better and schools to operate more effectively.”*
6. The focus on schools has to be balanced by the focus on initial teacher education. To achieve quality teaching in the classroom, principals do not want to spend limited resources on, for example, training teachers how to teach reading when they join the school. This work begins day one of initial teacher training. (The TEMAG recommendations identified the need to improve teacher education and ensure teachers where classroom ready. This area should be a part of the model, as the level of capability and skill of graduates will influence the quality of teaching in the classroom.)
7. APPA would also add that the quality of leadership in schools is impacted by the quality of professional development of leaders. A national approach to leadership development is required to ensure we have consistency and an opportunity to build capacity across systems and within systems.
8. As pointed out by the commission, Australian schools provide data to local and national systems. The sharing and access of this data and information across jurisdictions requires a better process. The focus needs to be based on the principle of purpose and value to the school and student.
9. The recommendation of student identifier requires more discussions and consultation. APPA agrees with the commission that further analysis on the cost versus the benefit is needed. Schools would find it difficult to support implementing a system that sees additional workload and resources for little value. The key benefit to schools is being able to access previous school reports or information that will assist the student with the transition into the new school. Improved transition would enable the learning momentum to be maintained and additional resources, if required, provided from day one of the student arriving at the school. Teaching staff would also be able to prepare and ensure programs to support would be in place and ready to implement.
10. Completing external surveys, case study projects and data collection requests all require time and, in some cases, funding to finish the task. This is not the essential work of teachers and school leaders. Teachers are collecting data regularly to inform practice and to provide whole school assessment. Researchers and organisations that request access to data and information should resource the school.
11. APPA strongly supports the need to reduce duplication. Where possible, data should only be collected once. The use of improved technology will likely aid systems in this area.
12. The Commission identifies the need to address the data gaps. In relation to a national Year 1 assessment, a number of state and territory systems already use an early assessment tool to identify students requiring intervention. So that this and similar data collection initiatives receive wide support, it is important to collate and present the evidence supporting the need for additional data collection.
13. The focus on differentiation and responding to individual needs has required teachers and schools to develop or source assessment and evaluation tools that support teaching and learning programs. APPA would recommend a discussion with primary school principals on the evidence-based tools that could be included in and accessed from a central depository. This would enable schools to identify the assessment practice that best suits their context and learning approach.
14. Schools have completed the Nationally Consistent Collection of Data on School Students with Disability. Schools and teachers have spent many hours collecting this data and recording modifications implemented for students. APPA understands the purpose was to identify the needs of students and that the data would support the allocation of resources. At this stage, APPA is not aware of any report or information coming from this collection. Therefore, APPA would be very concerned should this data be used to measure progress, when the original design was for a different purpose.
15. APPA strongly supports the notion of student cohort sample testing to gain national and system data for monitoring and trend observations.
16. The Early Years Learning Framework has been introduced, along with regulations and standards covering early childhood services. APPA believes it is timely that an evaluation of this initiative be conducted to measure the impact and identify modifications. One area of data collection that impacts on schools is the application of two regulatory authorities on a school that also includes an early childhood program. While the students are enrolled in the school, they are subject to different regulatory requirements. This could be an area where duplication could be reduced and more practical and realistic requirements implemented.
17. The suggestion of randomised controlled trials and individual trials is concerning for principals. This would require parental permission and understanding of the impact to the control group as well as the experimental group. Experimenting with children’s learning opportunities has implications with the ethics of such practice needing careful consideration and monitoring. APPA would welcome the opportunity to be involved in the development of guidelines and conditions for such trials.
18. APPA is supportive of the recommendation of a research institute that would collect and manage the evidence for what works best. The access to high quality evidence and research can minimise the repetition of research and help focus new research into areas required by schools. As schools move to technology-based platforms in learning programs, high quality evidence of effective practice around this area would be essential for schools and teachers. The research institute would be able to assist in building national consistency in best practice and developing a school’s capacity to conduct quality educational research.
19. Coordinating and disseminating quality research means that effective teaching strategies and practice could be shared among education systems and schools. School leaders best lead the process of change and professional development. Supporting leaders to develop their skills, knowledge and capability to lead and implement change could also be a focus of the Education Research Institute.
20. APPA strongly supports the Commission’s comment that any research effort needs to focus on how evidence can be translated most effectively into changes in practice. Australia is recognised as providing quality education within a federated and sector based system covering a wide range of contexts and settings. The development of evidence to enhance the education of students in Australian needs to have this focus and application. Simply importing programs, strategies or policy is likely to fail and waste current resources. This does not mean we do not learn from other systems; rather it means that we analyse evidence-based effective practice and adapt as appropriate the principles or learnings to our system. Australia is part of a global world and we need to prepare our students for this future. Schools need to be responsive to this need but also conscious and reflective of the society and environment within which they operate.
21. The Productivity Commission’s ‘bottom up’ focus is welcomed as this is providing the voice and involvement of the people upon whom the research will have the greatest impact. Finding out the needs of school leaders and teachers will greatly assist researchers in identifying evidence gaps and evaluation inadequacies.

**Comments regarding the recommendations and information requests**

**Information Request 3.1**

APPA suggests that a review of this instrument is required to determine if the information and data collected are aligned to the objects of the Early Years Learning Framework.

The challenge is that many schools also collect data at the start of the first full year at school for school entry assessment. They are also required to collect data for the AEDC. APPA would recommend any new assessment tools be trialled in Australian schools and this evidence then be disseminated to schools and systems for further consideration. It may be that schools already have effective early identification processes in place. Where this is not the case, then schools would implement evidence-based assessment tools.

**Information Requests 4.1**

The concept of a student identifier raises concerns around privacy and access to information. Schools would welcome the access to information to support transition, allocation of resources and program sharing. The identifier could also include capacity to hold a portfolio of student’s work and that could be used to demonstrate learning and achievement. The process would need to have regular reviews in place to ensure permissions were still current and changes to a student’s circumstances were updated.

**Comment on Draft recommendation 4.1**

APPA supports sampling rather than census data for national and system monitoring and reporting.

**Information request 5.1**

APPA is concerned about the move to have data more accessible for public interest research. The concerns include the possible identification of communities that could lead to negative labeling; that the research being undertaken is for the benefit of education practice and policy; and, the politicising of school education based on selective data or negatively biased reporting in the media.

APPA would welcome a recommendation that calls for further work on identifying and resourcing effective strategies for disseminating and implementing high quality evidence-based practice.

**Information request 8.1**

APPA would strongly encourage any development of a National Education Research Institute having clear purpose, focus and policies. The direction of the Institute is to serve the education community, especially schools. Therefore, APPA would see a heavy involvement of practitioners in the leadership and governance of the Institute.

The Australian Primary Principal Association appreciates the opportunity to provide a response to the draft report.

APPA would be available for additional briefings and contributions to support the work of the Productivity Commission in this public inquiry.

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**APPA President**