



NEW SOUTH WALES TEACHERS FEDERATION

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SUBMISSION TO

THE SENATE EDUCATION, EMPLOYMENT AND WORKPLACE RELATIONS (EEWR) COMMITTEE

INQUIRY INTO

THE ADMINISTRATION AND REPORTING OF THE NATIONAL ASSESSMENT PROGRAM – LITERACY AND NUMERACY (NAPLAN) TESTING

Authorised by

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General Secretary
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The New South Wales Teachers Federation is the registered trade union which covers NSW public school teachers. The New South Wales Teachers Federation represents all teachers in New South Wales public pre-schools, infants, primary and secondary schools and TAFE Institutes. Teachers in Schools for Specific Purposes and Corrective Services are also members. The total membership is 67,000 teachers.

As such it is well placed to represent the views of teachers and principals in New South Wales public education on the administration and reporting of NAPLAN testing. The Federation welcomes the Senate inquiry as a means to facilitate informed public debate on what has become a contentious political issue.

TERMS OF REFERENCE

- (a) the conflicting claims made by the Government, educational experts and peak bodies in relation to the publication of the National Assessment Program – Literacy and Numeracy (NAPLAN) testing

The controversy surrounding the publication of national NAPLAN testing results on the My School website and publication of league tables in national, state and community newspapers is a natural consequence of the federal government's adoption of discredited education policies from England and the United States. Such policies claim that comparing results of schools in large scale testing programs:

- provides accountability;
- provides an incentive for schools to improve their 'standards';
- assists parents in making choices between schools; and
- addresses inequity.¹

The federal government has embraced and persisted in these claims despite education research that mass testing, the ranking of schools and the publication of school "league tables" does not improve the quality of education. Indeed, the experience of England and the United State shows the opposite: a narrowing of the curriculum, greater inequity in schooling, a demoralised teaching profession and parents made anxious. The responsibility for addressing educational needs shifts from government to the individual school, its principal and teachers who do not necessarily have the resources to fix the problem. If need as measured by test results is not perceived to be addressed, then the school is at fault. Provided with such "information", the responsibility falls to parents to send their children to the better performing schools.

The My School website is designed to provide parents with information that allows school comparisons. If, however, governments at both state and federal level properly funded public education and affirmed its centrality for a secular equitable society, then anxious parents would not be tempted by the My School website's spurious claims of information to make a supposedly informed school "choice".

¹ Goldstein, H. and Leckie, G. (2008). School league tables: what can they really tell us?, *Significance*, June 2008, p.67.

Gillard, J. (2010, February 24) Address to the National Press Club, Canberra. <http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches>

The federal government has stated its opposition to the publication of “simplistic league tables” but has failed to entertain substantial changes to its My School website that would prevent the publication of league tables in national, state and community newspapers. It is the publication of league tables that creates winners and losers. Naming and shaming based on a misuse of test data does nothing to address the inequity in Australia’s education system identified in sample international testing regimes.

Political point scoring has taken priority over evidence based policy formulation. The publication of quantitative test data is considered the measure of “quality”, the means to provide ‘transparency’ and a spur to “improvement”. Together they constitute the counter to the perceived self interest of teachers, whose fear of public scrutiny has allegedly harmed education. The contentious political debate about the funding of public and private schools is framed as an ideological distraction.² The domains tested in NAPLAN: Reading, Writing, Language Conventions (Spelling, Grammar and Punctuation) and Numeracy are important underpinnings of academic success in all subjects. Their promotion as “high stakes” tests fits a Back to Basics curriculum designed to counter a perceived crisis in teaching standards and left wing teacher bias.

NAPLAN – “high stakes” tests despite limitations

Governments understandably seek value for the money invested in public education. It is now argued that value must be capable of measurement. This has turned NAPLAN into a “high stakes” test – not only for the reputation of individual schools and their communities but also for school funding. Under the National Partnership on Literacy and Numeracy, improvement in NAPLAN results is the only “performance indicator”. Successful achievement of improvements brings the New South Wales Government substantial “reward funding” of \$47.6million in 2011/12 and the same amount in 2012/13. ³ Yet as Alan Reid, Professor Emeritus of Education at the University of South Australia argues “learning outcomes are influenced by a range of social and cultural as well as educational factors, many of which are deep seated. These have to be identified and worked on over time. There is no quick fix”. ⁴ Better resourcing of our schools and greater respect for the profession have better chances of defeating the “demography as destiny” problem identified by Julia Gillard.

Writing of the UK experience, a prominent education statistician Harvey Goldstein has stated:

“The league table culture is symptomatic of a deeper problem with public debate that should concern citizens. Namely, a surface precision associated with numerical data is used, sometimes unscrupulously, sometimes in ignorance, as a substitute for serious and well-informed debate. The promotion of league tables as if they convey uncontested information about schools is just one example ...”⁵

This problem could be addressed by more inclusive policy decisions. The federal government is assuming greater control of education in Australia. Yet there is no practising teacher, principal or teacher union representation on the board of ACARA (Australian Curriculum Assessment Reporting Authority), the organisation responsible for NAPLAN and the My School website.

Good education is built on sound practice and research. Practising teachers, teacher unions, principals and their peak organisations, academics from across the political spectrum and former bureaucrats have protested the misuse of NAPLAN test data on the My School website and the

² Gillard, J. (2010, February 24) Address to the National Press Club, Canberra. <http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches>

³ New South Wales Department of Education v New South Wales Teachers Federation [2010] NSWIR Comm 47

⁴ Alan Reid, “The MySchool MyThs”, <http://sstuwa.org>

⁵ Goldstein, H. (2008). Evidence and education policy – some reflections and allegations. *Cambridge Journal of Education*, Vol.38, No.3, p.398.

construction of media league tables. Yet teachers report harassment when legitimate questions have been raised about the reliability of the test results that they are under pressure to improve. Given the misuse of data allows schools teachers and their communities to be falsely named, blamed and shamed, these are not insignificant professional concerns.

NAPLAN, like all tests, has its limitations as a diagnostic test. The test provides a limited snapshot in time. The NAPLAN tests are written tests. They are short at around 40 questions with most questions multiple choice and suitable for machine marking. Students know the writing test text type, that has been narrative for the past three years. Other written text types have not been tested such as expositions, persuasive arguments. The tests cover limited curriculum areas. ICT, creativity, thinking and speaking skills are not tested. Nor is group work or initiative – all necessary skills for the workforce and essential elements of the school curriculum. Students may sometimes deliver atypical results on the day based on a variety of factors – family problems, death of a family pet, feeling unwell. Any margin of error is magnified with small cohorts. The test is administered in May some three or four weeks into term 2. Results are not provided to parents/ caregivers and schools until mid September, towards the end of term 3. A class teacher may only have the student for another term! The first student report to parents is completed without the results of NAPLAN. Testing year 3 students in formal situations is problematic. Oral learners are not recognised. A student from a language background other than English may be unfamiliar with words used in a different context. Given statistical margins of error in the tests, schools and students can be judged harshly. This includes high schools being judged on year 7 NAPLAN results when the students have only been attending the school for just over a term.

My School website

The aggregation of NAPLAN test data on the My School website and comparisons to “like school” groups as a measure of school effectiveness misleads parents and the community. Associate Professor Margaret Wu, who has been closely involved with large scale international testing programs such as PISA and TIMSS has called on the government to be more honest in its claims:

it appears that the so-called transparency agenda is actually a ploy for putting pressure on all teachers, and not just those who are not performing, since there is no way that good or poor teaching can be identified using NAPLAN results, with or without 'like-schools' grouping. ... The government should come clean about the limitations of NAPLAN tests. That will be real transparency. And we owe that to the parents.⁶

The My School website is fundamentally flawed. NAPLAN is not meant to rank, compare and potentially shame schools. According to Chris Bonnor, a former president of the NSW Secondary principals Council, the website “shows all the signs of having been thrown together in a hurry to meet the timeline created by a political agenda”. As a consequence “too many schools and their communities are being unfairly labelled and harmed.⁷

The prominence given to quantitative data presented in colourful graphs projects an air of scientific authenticity that is essentially populist. For those who may have difficulty reading, the colour becomes the whole message. A New South Wales principal has commented: “No matter what other information is put on the My School website, it is the NAPLAN coloured graphs that people will look at and it is the comparisons they will use to judge the school.” The website magnifies the inherent injustices to school communities when NAPLAN test results are used by the media in the compilation of league tables.

⁶ Margaret Wu, “Using NAPLAN Results for Judging Schools”, Australian Education Union, 2010.

⁷ Chris Bonnor http://inside.org.au/my_school_and_your_school

ICSEA

The Index of Community and School Educational Advantage (ICSEA), the measure designed to soften school comparisons is not just misleading but also invalid and unreliable. It is supposed to prevent schools with dissimilar student populations being judged unfairly against one another. This has not occurred. Holroyd High School, a large multicultural high school in western Sydney with a high proportion of non-English speaking background students, many of whom have been in Australia as refugees for a short time was likened to Uralla Central School in the northern tablelands of New South Wales. Granville South High School, another western suburbs high school serving a predominantly non-English speaking background community is still compared to Coonamble High School and Menindee Central School in the New South Wales outback. The learning needs of students in culturally and linguistically diverse schools are different to those in regionally isolated, monocultural schools. Falsely based comparisons can lead to schools being judged 'deficient' when they are in reality only 'different'.⁸

ICSEA is based on Australian Bureau of Statistics census districts. Barbara Preston, an experienced education researcher reports: "The Australian Bureau of Statistics has strongly cautioned against the inappropriate use of area based indexes of disadvantage ... in recognition of the heterogeneous nature of areas as small as the ABS Census Collection district (CD) of around 250 households." This warning, combined with the ability of well funded private schools to choose their students and the requirement lesser resourced public schools accept all local students, means that public schools enrol the greater proportion of families from disadvantaged backgrounds. Her study of the Penrith Statistical Local Area (SLA) based on 2001 census data revealed a public school could have 16 disadvantaged students for every one advantaged student, while an independent school drawing from the same Census District would have equal numbers of disadvantaged and advantaged students. Under ICSEA, "both schools would be classified as equally disadvantaged." ICSEA values therefore underestimate the disadvantage of government schools and overestimate the disadvantage of private schools.

ICSEA does not currently recognise that schools in any one census collection district can differ in entry requirements such as fees, gender, academic results, religion, ethnicity, special aptitudes such as sport or the performing arts, behaviour. Even then there is no reference to whether such students come from high income or low income families.

Preston concludes: "... the use of area-based indexes of disadvantage/advantage are not appropriate for measuring the disadvantage/advantage of schools in Australia, especially for high stakes purposes and where there will be comparisons ("matching") between schools from different sectors or which have different formal or informal selection and exclusion practices."⁹ The exact circumstances of each family is a more accurate measure of disadvantage /advantage.

Gender breakdowns are not provided on the current website. Yet gender can be a significant factor in academic performance with studies showing boys and girls maturing at different rates and showing different interests and abilities. An analysis of schools who share an ICSEA ranking of 1000 reveals that schools with a higher proportion of boys in year 9 generally perform more poorly in reading whilst the same schools in numeracy "are more evenly spread in the top and bottom half".¹⁰ Chris Bonnor cites the chair of the board of ACARA, Professor Barry McGaw as having repeatedly stated that "70 per cent of the differences between schools is explained by whom they enrol rather than what the school does."¹¹ Margaret Wu argues that the "variation in NAPLAN performance

⁸ Carol Reid, <http://pubapps.uws.edu.au/news/index.php?act=view&story>

⁹ Barbara Preston, "Notes on the ecological fallacy when area-based indexes of disadvantage/ advantage are applied to schooling in Australia", barbara.preston@netspeed.com.au

¹⁰ Chris Bonnor http://inside.org.au/my_school_and_your_school

¹¹ Chris Bonnor http://inside.org.au/my_school_and_your_school

across schools within each group of “like schools” is most likely due to factors unrelated to school/teacher performance”. Further any variation could be explained by changes in the student cohort from year to year.¹²

The national aggregated data does however provide rich data for politicians and public policy makers. In aggregated form, where margins of error are considerably reduced, one analysis of the data has revealed that more high income families are represented in private schools; more indigenous students are in public schools and public schools have the fewest non teaching staff per student.¹³ Manipulation of the data to ask broader questions about social divides and equity is a useful tool to inform measures that address the low equity in Australian schooling identified in sample international testing.

League Tables

The government has declared its opposition to “simplistic league tables”, without precisely defining the essence of a “non-simplistic league table”. The My School website compares each school’s averaged test results in each of the tested domains to “like school” averages using colour coding. Red and pink are below average, green is above average and white is similar to the average. Despite the limitations of the NAPLAN tests, the ontological and methodological flaws in ICSEA, such “information” has been trawled by newspapers to name and shame schools.

The *Sydney Morning Herald* and the *Telegraph* published “simplistic league tables” 29 February 2010. The *Telegraph* used samples of local school groups whilst the *Herald* listed every school alphabetically and provided two state wide rankings. The first ranked the school on the average of the school’s results in reading, writing, spelling, grammar & punctuation and numeracy, while the second ranked the school on its ICSEA score. There were separate lists for primary and high schools. The feature box under the headline “TOP OF THE CLASS” highlighted the so called “top” six schools overall and “top” in each test. The *Telegraph* published its tables in the middle of the racing form guide.

Anna Patty, *The Sydney Morning Herald’s* Education Editor failed to acknowledge the limitations of NAPLAN, flaws in ICSEA and complexity in the measurement of school effectiveness in justifying her newspaper’s actions.

Well what we tried to do was, ah, decipher the information on the MySchool website in a way that it was a bit easier for parents to understand. ...Um, but I suppose it was just trying to simplify what was already there on the website. ... Now this is really insightful data in terms of working out how much good, I suppose, a school is doing in terms of helping each child improve their performance as they go through school.¹⁴

The Australian later published its 100 top schools. Justine Ferrari, *The Australian’s* education writer justified her newspaper’s actions in similar terms:

... the reason why newspapers do these tables is to present new information from the My School website in a more digestible, easily understandable way for parents in the community to understand...

I think we always wanted to do it responsibly. I mean, ah, where the editors planned this they were very sensitive, were very conscious of not wanting to stigmatise schools and made a conscious decision not to publish the hundred schools at the bottom of the school league table. I mean I think

¹² Margaret Wu, Using NAPLAN Results for Judging Schools, paper provided to the AEU

¹³ Chris Bonnor <http://inside.org.au/what-my-school-really-says-about-our-schools>

¹⁴ Interview with Deborah Cameron 12 May 2010 702 ABC Sydney www.newscentre.com.au

*there's a very strong argument to publish that, for the reasons I was saying earlier about parents' right to know and communities' right to know...*¹⁵

The journalists have missed the real story – the invalidity and unreliability of the data.

The *Illawarra Mercury* published league tables of the ICSEA ratings of the schools in its circulation area. The *Hawkesbury Gazette* stated on its front page: “The pressure is now on for teachers and pupils to deliver” before naming and shaming “the Hawkesbury schools which did not perform so strongly”.¹⁶ The Penrith based *Western Weekender* stated: “In NSW, Dunheved High School appeared to be the State’s worst school, while James Ruse Agricultural High achieved the best results.”¹⁷ No contextual data was provided even to state that James Ruse is an academically selective high school and Dunheved High serves a socio-economically disadvantaged community. Such local papers have a high density of circulation and exposure within the local community. The naming and shaming is that much more personal.

Being lowly ranked in a league table can be devastating for students, teachers and local communities. Naming and shaming schools makes it harder for schools in disadvantaged areas to improve and harder to recruit and retain teachers and students. Wilcannia is an isolated town in western New South Wales with a very low socio-economic community of predominantly Aboriginal people. Wilcannia Central School experiences difficulties attracting and retaining teachers. In the past five years, the school has had a qualified Maths teacher for one year only. The school community should not be shamed because of the inability to properly staff the school. The job, however, to find a properly qualified teacher is made that much harder in such schools with the publication of league tables.

League tables create greater inequality and increase segregation as a result of shifts in enrolment patterns. Ultimately they create an unwinnable competition between school communities. No matter how hard each school community works to improve its NAPLAN results, just under 50 per cent of schools will always be below average.

A survey of over 1000 principals by the AEU revealed “high levels of concerns about league tables and the accuracy of information on the My School website”. Among those principals who said their school was named in a newspaper league table this year:

- 51 per cent said being named in a league table would have a negative impact on their students. Among those listed in the bottom section of a league table the figure rose to 78 per cent
- 58 per cent said being named in a league table would have a negative impact on the school’s reputation. Among those listed in the bottom section of a league table the figure rose to 84 per cent
- 68 per cent said being named in a league table would have a negative impact on staff. Among those listed in the bottom section of a league table the figure rose to 87 per cent.
- 88 per cent of principals said the My School website was not an accurate picture of school performance.

New South Wales government promotion of parental “choice” has already contributed to social segregation in schooling, particularly in secondary schooling in Sydney and the major regional centres. The local comprehensive high school “competes” with specialist highs schools such as

¹⁵ Interview with Deborah Cameron 12 May 2010 702 ABC Sydney www.newscentre.com.au

¹⁶ *Hawkesbury Gazette*, February 3, 2010.

¹⁷ *Western Weekender*, 5 February 2010

selective, single sex, performing arts and sports high schools. With the appearance of the My School website, parents have made choices to take their children out of schools with lesser rankings and have re-enrolled them in schools with higher rankings. Differences in rankings can however be attributed to statistical margins of error. Such choices will intensify social segregation.

New South Wales public schools are enrolling a higher proportion of students with disabilities. In the ten years 1997 - 2007, the percentage of students with a diagnosis of disability eligible for additional support across the continuum of provision in New South Wales government schools more than doubled, rising from 2.7 to 6.7% of total enrolments.¹⁸ The increase in student numbers was most dramatic for students with disabilities in regular classrooms. Approximately 26,154 students¹⁹ were receiving support in regular or mainstream classes in 2007 compared to approximately 5000 in 1997 – a 523% increase. Despite the range of disability legislation, schools that enrol students with disabilities and special needs risk becoming residualised.

Value-added

ACARA is preparing advice on ways of providing “growth data on literacy and numeracy” or “value-added” data on the My School website. This would allow comparison of the performance of students who sat the first NAPLAN test in year 3, 5, or 7 with their performance two years later in years 5, 7 and 9. A school with students showing the most “growth” would be considered the most effective.

The methodology came to prominence in England under New Labour as a response to the damage to communities provided by league tables based on raw scores, tables that saw the most advantaged schools continually at the top. Value-added was seen to provide a way of overcoming the impact of raw socio-economic determinism in test results. Its political advocates saw it as a means of allowing disadvantaged communities to shine. Yet the value added measures were adopted despite research evidence including “an officially commissioned report” questioning its reliability and usefulness as “most schools could not be statistically distinguished from the average.”²⁰ The methodology in any case cannot be applied to schools with small and mobile populations and does not take into account differential rates of learning. Some students make rapid progress in earlier years and level out in later years.

Critics cite “a false air of precision” in such data. “Value added data cannot be readily explained publicly. Parents don’t understand it, and it raises more questions than it answers.”²¹ The value-added calculations “are rather worse than pointless”. They have an “apparent precision and technical sophistication” that can be “misleading”.²² They “turn out to be a proxy for the overall level of attainment in the school, and almost entirely independent of any differential progress made by the students.”²³

In 2002 in England, value-added was modified to take into account background factors such as ethnicity and free school meals eligibility. This is known as Contextual Value Added (CVA) data. Again margins of error are significant in the process of giving a value to the variety of “contextual factors”.

¹⁸ Graham, L.J. & Sweller, N. (in press). The Inclusion Lottery: who’s in and who’s out? Tracking inclusion and exclusion in New South Wales government schools, *International Journal of Inclusive Education*, p.11.

¹⁹ Graham, L.J. & Sweller, N., p.17.

²⁰ Goldstein, H. (2008). Evidence and education policy – some reflections and allegations. *Cambridge Journal of Education*, Vol.38, No.3, p.396

²¹ Ken Boston, “A response to the APPA position paper on the publication of nationally comparable performance data, August 2009
www.appa.asn.au

²² Gorard, S. (2006) Value-added is of little value. *Journal of Education Policy*, Vol.21, No.2, p.241.

²³ Gorard, S. p.235.

The Australian education researcher Brian Caldwell has stated that neither the public nor the profession can make real sense of league tables published with “value added” or “contextualised value added” adjustments. He argues: “Such approaches ignore the evidence that the differences within schools (between classrooms) are greater than the differences between schools, even if the comparisons were to be between “like schools”. Furthermore, the priority for schools is to personalise learning. Accordingly the most important data of all is related to how students are achieving in relation to their own personal learning plans and against standards.”²⁴

(b) the implementation of possible safeguards and protocols around the public presentation of the testing and reporting data;

Governments have an ethical responsibility to provide the legislative measures to ensure that children and their communities are protected from the misuse of educational data by the media. Freedom of the press does not come without responsibility. Legislation such as the Family Law Act prohibits the publication of information which could be harmful to young people. According to Associate Professor Carol Reid of the University of Western Sydney: *...A cornerstone of democratic society is procedural fairness and in this regard the My School website fails.*²⁵

Scotland and Wales²⁶ have withdrawn the publication of school results in recognition of the limitations of test results as a measure of school performance.

At the very least, the My School website must present information that is educationally valid and meaningful. This includes the following safeguards :

1. The NAPLAN results, both published and unpublished held by ACARA, should be protected from misuse through the consistent application of existing copyright, trade practices and FOI laws.
2. Information about the total income and resources of a school should be provided to allow for the meaningful analysis of the relationship between resources and outcomes. Such information should not just be per-student recurrent expenditure as this allows schools to hide the extent of their wealth and income-raising capacity.
3. Average scores should be replaced by graphs that show the full span of student achievement in student clusters representing five students at least with the margin of error clearly displayed.
4. Information on what NAPLAN tests do and do not test.
5. Greater prominence to be given to the context provided by school student reports, class assessments, discussions with teachers so that the limitations of drawing conclusions from a one off test are clearly communicated.
6. Replacement of the current ICSEA index with an index that better reflects the socio-economic status of students enrolled in a school together with factors which impact on educational outcomes. Teachers and principals should be fully consulted.

²⁴ Caldwell, B. (2009). Want World Class Schools? It's Time to Agitate. Paper delivered in the Agitation Hill Lecture Series in Castlemaine, 29 May 2009. www.educationaltransformations.com.au

²⁵ Carol Reid, http://pubapps.uws.edu.au/news/index.php?act=view&story_id=2685

²⁶ Goldstein, H. and Leckie, G., p.60

7. Abandonment of the current “like school” comparisons given the invalidity and unreliability of the methodology.
8. School self evaluation committees to analyse aggregate results with the purpose of providing explanations in the context of the school and its plan.
9. Provision of a comprehensive plain-English guide to interpreting school NAPLAN results should be made available on the website for download. This would include :
 - definitions of the “literacy” and “numeracy” tested;
 - clear statement on the purposes of NAPLAN including limitations of test data as measures of school effectiveness;
 - significance of small cohort size;
 - recognition of variations in student cohorts;
 - information on student absence, exemptions including any special education students who may not have sought or returned exemption forms; and
 - reference to the school’s annual report that provides contextual information.
10. Renegotiation of performance indicators under national partnership agreements to recognise the limitations of NAPLAN.
11. Federal and state legislation and Departmental policy to stop the publication of league tables.

New South Wales models for legislation and policy

The prohibition on the publication of the ranking and comparison of schools on the basis of standardised test data has been in place in New South Wales for over ten years without the media challenging the legislation or policy.

1. Education Act 1990 No 8 S.18A Publication of School Results [Appendix 1]

The Basic Skills test administered to students in years 3 and 5 was the New South Wales precursor to NAPLAN in years 3 and 5. The Act was amended in 1996 to state: “The results of basic skills testing must not be publicly revealed in a way that ranks or otherwise compares the results of particular schools.”

Further amendments addressed new statewide testing regimes and publication of league tables in newspapers. The advent of national agreements on education has however weakened the strength of the prohibitions and the New South Wales Government has chosen not to prosecute newspapers who have published league tables.

- (3) *School results must not be publicly revealed in a way that ranks or otherwise compares the results of particular schools, except as authorised by or under a relevant national agreement.*
- (4) *A person must not, in a newspaper or other document that is publicly available in this State:*

- (a) *publish any ranking or other comparison of particular schools according to school results, except with the permission of the principals of the schools involved, or*
 - (b) *identify a school as being in a percentile of less than 90 per cent in relation to school results, except with the permission of the principal of the school.*
- (5) *Nothing in subsection (4) prohibits:*
- (a) *anything authorised to be done by or under a relevant national agreement, or*
 - (b) *the publication of the ranking of the schools in the top 10 per cent in relation to the results of Higher School Certificate examinations and related assessments so long as the information used to determine that ranking is information as to the results of students that may be publicly revealed under subsection (6) (c).*
- (6) *School results must not be publicly revealed if the results of an identified student are revealed, except as follows:*
- (a) *to the student or to the student's parents, or to anyone with the student's or parent's consent,*
 - (b) *to the principal of a school (including a school in another State or Territory) at which the student is enrolling, is enrolled or was previously enrolled,*
 - (c) *in the case of results of School Certificate or Higher School Certificate examinations and related assessments—by or with the approval of the Board, by way of the publication of the results of students who the Board considers have achieved outstanding results.²⁷*

2. NSW protocols for the analysis and reporting of external test data in annual school reports-1998

In 1998 Federation negotiated with the Department of Education and Training under Director-General Ken Boston agreed documents: *Primary protocols for the analysis and reporting of external test data* and *Secondary protocols for the analysis and reporting of external test data*. [Appendix 2]

Each school in New South Wales continues to prepare its annual school report under protocols that embody sound educational practice. The agreed protocols recognise the importance of:

- confidentiality of individual student results;
- the size of the group and mobility of students for interpreting test data;
- the importance of a range of factors being considered in evaluating school effectiveness;
- the importance of an “an appropriate balance of qualitative and quantitative data”; and
- the importance of principals working “with parent organisations to ensure the purposes and uses of student achievement data are meaningful and understood by the school community.

Secondary protocol 3 states a clear opposition to league tables on educational and methodological grounds: “The Department of Education and Training reject as educationally inappropriate and misleading the production and publication of *league tables* of any type.”

²⁷ <http://www.legislation.nsw.gov.au/fragview/inforce/act+8+1990+pt.3+0+N?>

Secondary protocol 4 states the clear responsibility of teachers, principals and Departmental officers not to be engaged in practices that allow comparisons between individual students and schools.

Secondary protocol 11 states: "Test results will not be used publicly to advertise or denigrate students, schools, teachers or principals."

Secondary protocol 12 states: "Test results are to be used in a way which takes account of social justice to ensure that unfair labelling and/or unfair comparisons of particular groups of students or groups of schools does not occur."

Primary protocol 4 states: "Departmental employees at system and school level will not publish or broadcast, or aid in the publication or broadcast of any information or achievement which allows the comparison between individual students or which will allow schools to be ranked in any publication or broadcast."

Primary protocol 6 states: "Many factors should be considered in evaluating school effectiveness. Basic Skills Test data alone is not a valid indicator. No simple conclusions can be drawn between individual student achievement data and school effectiveness."

(c) the impact of the NAPLAN assessment and reporting regime on:

1. The educational experience and outcomes for Australian students

The federal government's promotion of the NAPLAN assessment and the publication of student test data as a tool to assist parental choice of school and as a measure of school effectiveness has diverted attention from difficult federal political issues that impact on the quality of schooling: funding policies and the divide between public and private education.

Just over a decade since the negotiation of protocols on the reporting of test data that recognise the importance of qualitative and not just quantitative data, schools in New South Wales are being pressured to evaluate their performance almost solely in terms of NAPLAN results. Some schools have reported an obsessive focus by school education directors on programs to improve test results without engaging in genuine dialogue with the teachers themselves and without regard to the methodological flaws in the website data. This has included consideration of cohort size and composition, fluctuations in the abilities of particular cohorts, margins of statistical error and the interpretation of marking guidelines. For the numerous small country schools, the skewing of results based on small cohort size has contributed to unnecessary anxiety in some communities.

The appearance of the My School website this year has intensified the pressure to deliver improved test results at all costs, particularly those schools whose results in the "like school" comparisons have fallen into the green bands – below the average. This has included calls to just focus on English and Maths activities. Yet in a relatively advantaged school region such as North Sydney, teachers in schools that performed "well" on the My School website are now having their results scrutinised in terms of across region comparisons. Teachers are reporting a bullying, demoralising, blame the teacher culture that pays no regard to the limits of NAPLAN testing and the opportunities a rich, broad curriculum provides to address the full range of literacies and numeracies.

The My School website and publication of league tables turns testing into “high stakes” testing that is now threatening the integrity of the curriculum. The pressure to improve NAPLAN results is felt by all schools and is becoming the central focus in school plans. After only three years of NAPLAN high stakes testing, there is extensive evidence of teaching to the test at the expense of the broader curriculum, particularly in the first term of the year and the few weeks of second term before the test. The NAPLAN website states: “Teachers will ensure students are prepared for the tests and will provide appropriate support and guidance.” Given the “high stakes” nature of the testing, teachers are feeling under pressure to do more than just familiarise students with the test format. Teachers know well beforehand the writing task: “The Writing task requires students to write a narrative (story).”²⁸ As a consequence, primary school and high school English programs have changed scope and sequence to ensure that narrative writing skills are practised and even sample stories prepared. Schools that before NAPLAN may have taught a range of text types in the first term and the three weeks at the beginning of Term 2 are now focussing just on narrative.

There are reports of primary schools delaying teaching the curriculum areas other than English and Maths until after NAPLAN. Secondary schools also feel pressured to run special programs focussing on NAPLAN skills. Whilst literacy and numeracy skills underpin all subjects, the pressure in schools with low raw scores is to devise programs focussing on a very narrow set of literacy skills. There are examples of schools suspending an elective subject for a period to allow NAPLAN skill practice and providing discrete time for “literacy” or “numeracy” devoid of any context other than NAPLAN. Some weaker students may be withdrawn from class for NAPLAN skill practice. Others have raised concerns that their school might not perform well because they have not practised exhaustively for the test.

Other schools have reported comments that shift the preparation to the year before the NAPLAN test. One school staff was informed: “Term 3 is critical – you have 12 months before next year’s NAPLAN”. Another school staff was informed that the best teachers should be put on the year 2 and year 4 classes so that the following year’s NAPLAN tests results could be maximised. Yet another school staff reported pressure on teachers of year 1 and 2 to ensure their programming prepared students for NAPLAN even though NAPLAN was testing concepts not taught until year 3.

The obsession with NAPLAN can ignore the reality that so many factors that impact on student performance at school lie outside the resources of many schools to address. Hungry children require a breakfast program for instance. If targets are to be set, then schools need “a prior increased investment of people, class time, facilities and other resources. It can’t be done simply by setting a target and telling the schools to get on with it.”²⁹

Schools in the pink and red zones have reported students leaving to attend the green schools, particularly in areas where schools are closely situated. One principal reported: “This year a parent actually stood up at a P&C meeting and apologised for their child because he has severe learning difficulties and how this will severely effect the results of our school. No parent should have to do this. She was particularly worried about how it will reflect on me as a new principal! Sad.” Principals are reporting spending considerable time with parents putting the My School data into context.

²⁸ www.naplan.edu.au

²⁹ Ken Boston, “A response to the APPA position paper on the publication of nationally comparable performance data, August 2009
www.appa.asn.au

The publication of league tables and articles in newspapers ranking schools has demoralised students and their teachers. When such rankings are based on contestable methodologies the public naming, shaming and blaming is hard to endure, particularly for those teachers and students who are not able to see through the politics of testing.

The trends suggest that the English experience is on the way to being replicated in New South Wales. The former NSW Director-General Ken Boston has written of his recent observations as CEO of Britain's Curriculum and Qualification Authority "... the government's approach to the key stage tests has sucked the oxygen from the classrooms of primary schools ... it is not the tests themselves so much as the high stakes attached to them, the archaic methods of delivery and marking and the multitude of invalid uses to which they are put. In all but those schools principled enough to resist the pressure on them, the primary school curriculum has become a dry husk. The teaching program focuses on what is to be tested and on practising for the tests, because the future of the school (not that of your son and daughter) is dependent on the result."³⁰

II. The scope, innovation and quality of teaching practice

Teachers, like other workers perform at their best when they know that they are valued, their professional expertise is respected and they are supported. They resent political interference in the face of overseas failures and educational research. Teachers are self critical, must continually evaluate their material to survive in the classroom – what works with one class may not with another. Teachers are eclectic continually looking for what works whether it be phonics and whole language approaches to reading.

The national testing agenda and the obsession with viewing school performance through the lens of NAPLAN is in conflict not only with the 1998 protocols but also with the 2003 Quality Teaching framework that provides the model for pedagogy or teaching practice in New South Wales public schools.

There are three dimensions to the Quality Teaching pedagogy:

- intellectual quality
- quality learning environment
- significance of work.

Teachers are required to plan their work within the Quality Teaching framework. It requires students to be engaged in rich tasks that allow the development of higher order thinking skills. Multiple choice, snapshot tests are a poor measure of such activities.

III. The quality and value of information about student progress provided to parents and principals, and

Student reports to parents, usually biannually, provide information on student progress on the whole school curriculum as well as comments on behaviour, attendance and extra curricular activities. They are informed by classroom and school observation as well as progress in tests and other formal assessments. Parents continue to have the opportunity to contact the school to seek progress reports. Similarly teachers continue to contact parents/ caregivers if there are

³⁰ Ken Boston, *The Sunday Times*, 26 April 2009.

concerns or grounds for particular praise. Schools continue to provide special information evenings.

These activities provide superior information to parents and principals than the current My School website.

IV. The quality and value of information about individual schools to parents, principals and the general community

Education is based on values of cooperation – between teachers, parents and students. Schools develop strong relations with the community based on the community's priorities and values. The My School website has the potential to limit the scope of that relationship.

All New South Wales public schools are required to prepare an annual school report within a set template that details all aspects of the school's operation including qualitative and quantitative data on the progress of students at the school. Importantly, detailed contextual information is given about the school – its finances, its organisation, its goals and areas that have been the subject of evaluation. All parents can access these reports through the school with many schools providing the reports on their websites. The information in these detailed reports is supplemented by school websites providing current information on cultural, sporting activities, community and welfare programs. All schools have parent/teacher meetings, open days and all parents/caregivers can make appointments at times that are convenient. Parents/caregivers can visit schools for debates, year farewells, sporting matches. Parents may work as volunteers in school canteens, in classrooms on reading programs. There are so many opportunities for parents and the general community to both analyse and experience the work of their schools.

The resources spent on the My School website might be better spent providing resources to allow improved reporting to parents on their children – teacher time, modern phone systems, provision of computers to all teachers.

(d) international approaches to the publication of comparative reporting of the results, i.e. "league tables"

Finland does not have national testing, there are no comparisons of schools based on local testing and no league tables. Yet students are tested regularly and teachers are well trained to interpret test results. "The public and the professional would never countenance what is occurring in Australia."³¹ Yet their school's results are among the best in the world. England and the USA do have league tables, yet their schools are rated lower than Finland's and Australia's.

There is no evidence that the introduction of league tables has improved educational outcomes anywhere in the world. Well-documented evidence shows the opposite.

England

In England the publication of league tables over the last twenty years has distorted the curriculum so that in many schools music, drama, excursions have suffered as schools simply coach for the tests to improve their newspaper rankings.

³¹ Caldwell, B. (2009). Want World Class Schools? It's Time to Agitate. Paper delivered in the Agitation Hill Lecture Series in Castlemaine, 29 May 2009. www.educationaltransformations.com.au

The Cambridge Primary Review, an independent inquiry into the condition and future of primary education in England was the largest inquiry into English primary education in forty years. It took three years to complete, drew on more than 4000 published sources, both national and international, together with: 28 specially-commissioned research surveys; 1052 written submissions from leading organisations and individuals; seminars and conferences and an extensive trawl of official data. The Review's director was Professor Robin Alexander of Cambridge University. The report was released in late 2009.

Opposition to national testing and the publication of league tables united all participants in the review. "If there is one thing the review's witnesses, submissions and research evidence are agreed on it is that national tests and tables are narrowing the curriculum, limiting children's learning and failing to provide sufficiently broad and reliable information about individual children, schools or the primary sector as a whole. They are too limited in scope to tell us much about a particular child's progress, and no single instrument can fulfil all the tasks expected of Sats." [national tests]³²

The inquiry was critical of political interference in education by unelected and unaccountable advisers and bureaucrats without reference to the profession. Following concerns about the reliability of the national tests and their representativeness of the broad curriculum, the Sats tests for the first year of secondary education were abolished and replaced with sample testing in 2008. The inquiry concluded "... it is not testing which raises standards but good teaching."³³

The inquiry called for the separation of assessment for learning from assessment for accountability. The two forms of assessment have become entwined in claims for the My School website to provide diagnostic information for parents as well as measures of school effectiveness.

A survey of English primary schools conducted by the Qualifications and Curriculum Authority in 2007 showed:

- 68 per cent of primary schools employed additional staff to prepare students for the tests;
- 78 per cent set additional homework;
- More than 80 per cent had revision classes and used practice tests they had purchased commercially;
- 70 per cent of schools spent more than three hours per week on test preparation in the months before the tests.³⁴

The Authority's former Chief Officer, Ken Boston argues employers want not just basic skills but also the skills that are not able to be tested in the formal tests - the ability to work constructively and in teams, ability to show initiative and enterprise and a thirst for continued learning. Further minute changes in test results from year to year are used by the media to fuel speculation about falling standards and by politicians to prove how policies are working. Tests do not "give an accurate measure of annual change in educational performance."³⁵

Gordon Stanley, former head of the Board of Studies in NSW and now Director of the Oxford University Centre for Educational Assessment has commented on the skewing of teacher attention to

³² http://www.primaryreview.org.uk/Downloads/Finalreport/CPR-booklet_low-res.pdf, p.30

³³ Media release and Introducing the Cambridge Primary Review, pp.8-9 www.primaryreview.org.uk

³⁴ Ken Boston, "A response to the APPA position paper on the publication of nationally comparable performance data, August 2009 www.appa.asn.au

³⁵ Ken Boston, "A response to the APPA position paper on the publication of nationally comparable performance data, August 2009 www.appa.asn.au

those most likely to improve school scores, a common feature of critiques of high stakes testing programs in the United States: “a whole industry [has been] created around improving performance on the tests rather than necessarily improving students’ learning skills. This has led to a lot of teaching to the test and schools focusing on kids who are close to achieving the targets on the view that they are going to be the easiest to improve.”³⁶

Despite two decades of league tables in England, England still lags well behind Australia in international assessments of student performance conducted by the OECD.

United States

George Bush Senior’s 2001 legislation No Child Left Behind (NCLB) had bipartisan support when proposed as hopes were high that a punitive high stakes testing regime would force some states and school districts to address entrenched educational disadvantage. Instead it has amplified the problems. American schools have become resegregated to a greater extent than prior to the USA Supreme Court Judgement *Brown v Board of Education* (1954) which outlawed segregation in American schools. The schools with the lowest test results have funds directed away from their schools labelled “failing schools”. There is a perverse incentive for schools to exclude students who are most in need of support. “Teachers struggle to balance the demands of remaining employed and keeping their school open while trying to avoid the individual needs of students being marginalised.”³⁷ There have been declines in student motivation and higher dropout rates³⁸; schools have focussed on those students who are likely to improve their test scores at the expense of those who can not and high achieving students.³⁹ Hispanic and African American students are being encouraged to leave but not white or Asian students.⁴⁰

Dianne Ravitch was the Deputy Secretary of Education under the administration of George Bush Senior. Once outspoken about the power of standardised testing and free markets to improve schools, she has written of the intellectual crisis she underwent when she discovered that these strategies were undermining education. She now says No Child Left Behind’s requirements for testing in maths and reading have squeezed vital subjects like history and art out of classrooms. The requirement that schools test all students every year in grades three through to eight, and report their scores separately by race, ethnicity, low income status, disability status and limited English proficiency has increased inequality. The draconian penalties, including closure or privatisation, that schools face if every group in the school does not make adequate yearly progress resulted in 35% of the public schools in the US being labelled as failing in 2009. States have responded by dumbing down their standards so they could claim they were making progress. Because the law demanded progress only in reading and maths, there was no incentive to teach the arts, science, history, literature languages or physical education. American schools as a result are producing graduates who are drilled regularly on the basic skills but are often ignorant about everything else.⁴¹

Linda Darling-Hammond, a researcher on school effectiveness presents the same picture. State mandated testing regimes have undermined access for low achieving students. Improved test scores in the 1990s in Texas were accompanied by high drop out rates of African American and Latino students. She comments on political interference where “passing scores have been lowered and the

³⁶ Caldwell, B. (2009). *Want World Class Schools? It’s Time to Agitate*. Paper delivered in the Agitation Hill Lecture Series in Castlemaine, 29 May 2009. www.educationaltransformations.com.au

³⁷ Butland, D., *Testing Times*, NSW Teachers Federation Eric Pearson Study Report, June 2008.

³⁸ Amrein, A, Berliner, D (2003). The Effects of High Stakes testing on Student Motivation and learning. *Educational Leadership*, February 2003.

³⁹ Booher-Jennings, J. (2005). Below the Bubble: “Educational Triage” and the Texas Accountability System. *American Educational Research Journal*. Vol.42, No.2, pp.231-268 and Booher-Jennings, J. (2006). Rationing Education in an Era of Accountability. *Phi Delta Kappan*, Vol.87.No.10, pp.756-61

⁴⁰ Bernstein, D.(2004). *Adios Escuela*. The Boston Phoenix, March 12-18, 2004.

⁴¹ Ravitch, D. (2010) *The Death and Life of the Great American School System: How Testing and Choice are Undermining Education*, New York: Basic Books

tests have been made easier over time to give the appearance of gains.”⁴² Darling-Hammond draws the same conclusions: “high-stakes tests can narrow the curriculum, pushing instruction towards lower cognitive skills and can distort scores”. There are incentives for holding students back, for pushing “low-scorers into special education” and encouraging them to drop out so that school average scores look better. Schools have “selective admission, transfer and even push out policies.”

The use of standardised test results to rank schools and judge teachers continues to produce allegations of cheating in American schools. In a Texas elementary school recently, the principal, assistant principal and three teachers resigned in a scandal over test tampering. Last December, the New York Department of Education moved to dismiss the assistant principal of a contemporary arts high school for changing students’ answers on an external examination. In Atlanta, Georgia, an elementary school principal and assistant principal were arrested on charges of “altering public documents” for allegedly changing students’ test answers. Nearly 200 other schools in the state have been investigated over allegations of changes to students’ answers on tests. The problem is so widespread that there are now specialists in data forensics who are employed to detect patterns of school test score results to expose cheating. Ohio and California screen all tests for suspicious erasures.⁴³

Australia should not embrace such policies.

⁴² Linda Darling Hammond, “Standards, Accountability and School Reform 2004 www.tcrecord.org

⁴³ <http://www.nytimes.com/2010/06/11/education/11cheat.html?scp=1&sq=Teachers%20cheating&st=cse>
<http://learning.blogs.nytimes.com/2010/06/11/are-your-teachers-under-too-much-pressure/?scp=4&sq=Teachers%20cheating&st=cse>

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Part 3 Division 3

Section 18A

18A Publication of school results

(1) In this section:

relevant national agreement means an agreement between the State and the Commonwealth that gives effect to a national protocol or arrangement for the provision and publication of school results.

school results means the following results (whether they are the results of individuals or of schools or any other results):

- (a) results of national basic skills testing (including testing under section 18),
- (b) results of School Certificate and Higher School Certificate examinations and related assessments,
- (c) results of annual or other periodic assessments of the academic performance of students contained in reports to parents on student achievement.

The regulations may determine whether particular results are or are not results referred to in paragraphs (a)–(c).

(2) School results may, in accordance with a relevant national agreement, be provided by the State to the Commonwealth or to an authority established by the Commonwealth.

(3) School results must not be publicly revealed in a way that ranks or otherwise compares the results of particular schools, except as authorised by or under a relevant national agreement.

(4) A person must not, in a newspaper or other document that is publicly available in this State:

- (a) publish any ranking or other comparison of particular schools according to school results, except with the permission of the principals of the schools involved, or
- (b) identify a school as being in a percentile of less than 90 per cent in relation to school results, except with the permission of the principal of the school.

Maximum penalty: 50 penalty units in the case of an individual and 500 penalty units in any other case.

(5) Nothing in subsection (4) prohibits:

- (a) anything authorised to be done by or under a relevant national agreement, or
- (b) the publication of the ranking of the schools in the top 10 per cent in relation to the results of Higher School Certificate examinations and related assessments so long as the information used to determine that ranking is information as to the results of students that may be publicly revealed under subsection (6) (c).

(6) School results must not be publicly revealed if the results of an identified student are revealed, except as follows:

- (a) to the student or to the student's parents, or to anyone with the student's or parent's consent,
- (b) to the principal of a school (including a school in another State or Territory) at which the student is enrolling, is enrolled or was previously enrolled,
- (c) in the case of results of School Certificate or Higher School Certificate examinations and related assessments - by or with the approval of the Board, by way of the publication of the results of students who the Board considers have achieved outstanding results.

(7) The functions of the State under this section may be exercised by the Director-General or, if authorised by a relevant national agreement, by a State educational authority that arranges the testing, examinations or assessments concerned.

(8) This section has effect despite any other Act or law or the decision of any tribunal.

Agreed documents

Secondary protocols for the analysis and reporting of external test data

1. The reporting of School Certificate and Higher School Certificate data must respect the confidentiality of individual student results.
2. Any use of School Certificate and Higher School Certificate data must take into account limitations imposed by the size of the group and mobility of students.
3. The Department of Education and Training rejects as educationally inappropriate and misleading the production or publication of *league tables* of any type.
4. Departmental employees at system and school level will not publish or broadcast, or aid in the publication or broadcast of any information or achievement which allows comparison between individual students or which will allow schools to be ranked in any publication or broadcast.
5. Many factors should be considered in evaluation school effectiveness. School Certificate or Higher School Certificate data alone is not a valid indicator. No simple conclusions can be drawn between individual student achievement data and school effectiveness.
6. The annual report is not the mechanism for identifying ineffective teachers.
7. Teachers, principals and other departmental officers will ensure that information about student achievement is not misused.
8. Reporting of student achievement must include an appropriate balance of qualitative and quantitative data and communicate clearly and directly the meaning of that data.
9. Principals will work with parent organisations to ensure that the purposes and uses of student achievement data are meaningful and understood by the school community.
10. In schools with small enrolments in a year or course, special care must be taken with the use of data to ensure individual students are not identified.
11. Test results will not be used publicly to advertise or denigrate students, schools, teachers or principals.
12. Test results are to be used in a way which takes account of social justice to ensure that unfair labelling and/or unfair comparisons of particular groups of students or groups of schools does not occur.
13. Applications to conduct research within the Department of Education and Training will be considered carefully on their merits, taking into consideration privacy matters and any implications for schools, teachers and students.
14. The undertaking for the ELLA test is [described] in the Ministerial letter of February 21, 1997. It provides for ELLA test results being treated in the same manner as the results of the Basic Skills Test.
15. It is recognised that further negotiations will take place arising from any significant changes such as the release of a revised policy on the HSC.

Primary protocols for the analysis and reporting of external test data

1. The reporting of Basic Skills Test data is governed by the Education Reform Regulations 1996.
 - (i) The results of basic skills testing must not be publicly revealed if the results relating particular children are revealed.
 - “However, the results relating to a particular child may be revealed:
 - “to the child, and
 - “to the child’s parents, and
 - “to the principal of the school in which the child is enrolled and, if the child was enrolled at some other school at the time the tests were conducted, to the principal of that other school.
 - “The results of basic skills testing must not be publicly revealed in a way that ranks or otherwise compares the results of particular schools.”
2. Any use of Basic Skills Test data must take into account limitations imposed by the size of the group and the mobility of students.
3. The Department of Education and Training rejects as educationally inappropriate and misleading the production or publication of *league tables* of any type.
4. Departmental employees at system and school level, will not publish or broadcast, or aid in the publication or broadcast of any information or achievement which allows comparison between individual students or which will allow schools to be ranked in any publication or broadcast.
5. The Basic Skills Tests are embedded in the Primary curriculum and are reported in ways which direct teachers to appropriate teaching and learning activities for students.
6. Many factors should be considered in evaluating school effectiveness. Basic Skills Test data alone is not a valid indicator. No simple conclusions can be drawn between individual student achievement data and school effectiveness.
7. The annual report is not the mechanism for identifying ineffective teachers.

8. In schools with small enrolments in a particular grade, special care must be taken with the use of data to ensure individual students are not identified.
9. Teachers, principals and other departmental officers will ensure that information about student achievement is not misused.
10. Reporting of student achievement in the Annual Report must include an appropriate balance of both qualitative and quantitative data and communicate clearly and directly the meaning of that data.
11. Principals will work with parent organisations to ensure that the purposes and uses of student achievement data are meaningful and understood by the school community.
12. Test results will not be used publicly to advertise or denigrate students, schools, teachers or principals.
13. Test results are to be used in a way which takes account of social justice to ensure that unfair labelling and/or unfair comparison of particular groups of students or groups of schools does not occur.
14. Applications to conduct research within the Department of Education and Training will be considered carefully on their merits, taking into consideration privacy matters and any implications for schools, teachers and students.
15. It is recognised that further negotiations will take place arising from any significant changes such as the release of a revised policy on the HSC.

Advice to school self-evaluation committees on the nature and language of reports

1. The analysis and reporting of student achievement data will be consistent with the protocols.
2. The reports must communicate the school's achievements in a balanced, open and genuine way to the particular community of the school. The language and style should be accessible to the community and, where necessary, interpreting services should be arranged to facilitate discussion of the Annual Report in languages other than English.
3. Templates are provided to ensure a consistent format for the reports.
4. The parties note that a range of sample reports have been provided to illustrate ways of reporting, that are not prescriptive in either content or language, provided that the significant information about the areas of strength and areas for improvement is clearly communicated.
5. The school self-evaluation committee should have available all relevant data, provided that the privacy and confidentiality of individual students is preserved. The Committee with the assistance of the CEO will analyse all data and determine the balance of quantitative and qualitative data to be reported.
6. In the preparation of annual school reports, schools will consider, and use if appropriate to their circumstances, the four types of comments below:
 - state-wide comparison comment
 - strengths in curriculum comment
 - internal school comparison comment
 - student growth comment.