



NEW SOUTH WALES SECONDARY PRINCIPALS' COUNCIL

Submission to the Senate Education, Employment and Workplace Relations Committee

Inquiry into the administration and reporting of NAPLAN testing

Summary

This submission focuses on the first Term of Reference,

“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 third Term of Reference is also relevant to this submission, in particular the impact of the NAPLAN assessment and reporting regime on the quality and value of information about individual schools to parents, principals and the general community

As a consequence, the NSWSPC submission mainly refers to the development of *My School* and the current manner in which NAPLAN test results are currently reported on the *My School* website. It raises a number of issues in the following categories:

- General issues relating to the development of *My School*
- General limitations of NAPLAN tests
- Using NAPLAN to compare schools
- Developing ICSEA
- What ICSEA doesn't include
- Future directions of *My School*

The NSWSPC believes that it is well placed to comment on these aspects of the Inquiry from the perspective of public schools. The perspective of principals includes the micro view of the schools they lead as well as the macro view of our framework of schools.

Notwithstanding anything in this submission the NSWSPC is committed to rigorous, accurate and meaningful accountability of schools. To the extent that this is its purpose, the publication of NAPLAN on *My School* fails to achieve any of these qualities.

We understand that some of the concerns raised in this submission are being addressed by ACARA. Where this is known, we acknowledge the fact and we include any relevant comments we have received from ACARA to date.

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1. General issues relating to the development of *My School*

There have been many statements made about why and how *My School* was developed as well as about the validity of using NAPLAN test scores to say something meaningful about each school. The NSWSPC believes that many claims made by both the Deputy-Prime Minister and ACARA about *My School* – especially claims about its accuracy and its utility - cannot be substantiated. The NSWSPC hopes that the Senate Inquiry will go much closer than have attempts to date, to holding the Rudd Government and ACARA to account for these claims.

Issue	Response from the NSWSPC	Additional comment and questions
<p>1.1 General claim about <i>My School</i></p> <p>The Deputy-Prime Minister (April 2010) has stated that: “The <i>My School</i> website ... empowers parents and the community to ... make up their own minds about the performance of their local school.”¹</p>	<p>This submission will show serious concerns about the reliability and validity of information on the website in relation to school performance.</p>	<p>Parents should be empowered to make up their own minds about schools. But we must carefully measure the harm created if empowerment is based on insufficient or misleading information.</p>
<p>1.2 The extent of consultation</p> <p>ACARA claims that the <i>My School</i> website was developed “in close consultation with schools and school jurisdictions right across Australia.”²</p>	<p>The CEO of ACARA, Dr Peter Hill has been asked about the extent of this consultation but a number of questions still need to be answered. How many schools and which particular schools were consulted? Were they invited to participate? Were the schools informed of the full purpose and intention of <i>My School</i>? What questions were asked of these schools? What were their responses?</p>	<p>The NSWSPC believes that decisions were made about the use of NAPLAN in <i>My School</i> in the absence of serious consultation with schools. Notwithstanding the political pressure on ACARA, many of the deficiencies identified in this submission could have been avoided if the consultation process had genuinely reached principals and schools.</p>
<p>1.3 The merits of the existing portrayal of data</p> <p>The CEO of ACARA, Dr Peter Hill, has stated that use of growth data (value-added) is the best way to compare the academic performance of students in schools.³</p> <p>The Chair of ACARA, Professor Barry McGaw has said ACARA will report growth data and it will “publish this information in addition to, rather than instead of, the currently displayed information”⁴</p>	<p>If this is true why does <i>My School</i> make such confident claims about the existing site which uses a process which ACARA now implies is clearly not the best available and is, by inference, inadequate for the task.</p> <p>If the “currently displayed information” is not the best – and is arguably a most misleading - way to compare academic performance, why will it continue to be used at all?</p>	<p>In any move towards measures of growth/value added what account will ACARA take of research which cautions about the use of such measures, in particular the extent to which growth measures are impacted by family and neighbourhood as distinct from schools?</p>
<p>1.4 Claims about how <i>My School</i> can be used</p> <p>Professor Barry McGaw has stated that “the <i>My School</i> website offers comparisons that do take account of context and that does depend</p>	<p>But the website claims that <i>My School</i> “allows and encourages comparisons” of schools.</p> <p>So does it just offer comparisons or</p>	<p>The use of “comparable” in Professor McGaw’s letter raises other questions. Exactly how “comparable” do levels of socio-educational advantage have to be to</p>

<p>on identifying schools with students with comparable levels of socio-educational advantage”⁵</p>	<p>does it <i>encourage</i> them? The distinction is important: Barry McGaw casts ACARA in the role of merely offering information – but the website encourages the use of what this submission will show to be misinformation. In reality, ACARA does much more than “offer” information and it – together with the Australian Government – has to be clear about, and accountable for, what it has created.</p>	<p>enable fair and accurate comparisons between schools? In the development of <i>My School</i> what benchmarks were used to judge “comparability”? Does the Government and ACARA continue to stand by the demonstrably absurd comparisons which are still allowed and encouraged by <i>My School</i>?</p>
<p>1.5 Some broad claims made about comparing schools</p> <p>The Deputy-Prime Minister (April 2010) has stated that: “The Index of Community Socio-Educational Advantage (ICSEA) currently used by ACARA is a valid, robust measure that allows the comparison of schools which, on average, have students who experience a similar level of educational advantage or disadvantage.”⁶</p> <p>The Deputy-Prime Minister has stated that: “ACARA worked with schools systems to develop the index and out of nearly 10,000 schools across Australia, ACARA have only received requests from 26 schools to review their published ICSEA score.”⁷</p> <p>In relation to the impact of <i>My School</i> comparisons on “underperforming” schools the Deputy-Prime Minister has stated that: “In Australia there are no direct adverse consequences for poor performing schools. Comparing a school’s performance with other schools with similar student populations may highlight schools that are not performing as well as others with the same kinds of students. It would be expected that education authorities will direct resources to assist schools in achieving better outcomes for their students.”⁸</p>	<p>At best this overstates – and at worst misrepresents – what ICSEA is and does. Several papers have now been written which call into question the efficacy of this measure, especially as it does not link specific student background information to the schools in which they are actually enrolled.</p> <p>This seriously understates the problem. The changes that occurred to quartiles after <i>My School</i> was launched revealed that about 7% of schools had had their ICSEA changed – some by amounts that are extraordinary for a measurement process that is touted as “robust” and “reliable”.</p> <p>But the NSW Department of Education and Training, at least, has been conducting program and school reviews based on a range of data including, but not limited to, student performance data. There have been instances of direct intervention, with consequences for some principals, executive and classroom teachers as a result. None of this required the public shaming of the school and its community</p>	<p>Neither the Deputy-Prime Minister nor ACARA have been sufficiently questioned by the media in particular on the well-documented deficiencies of <i>My School</i>.</p> <p>As an organisation representing public schools, NSWSPC has heard concerns raised by many more than 26 schools in NSW alone. Because of the esoteric, opaque and variable nature of the data from which ICSEA was derived, it is hardly reasonable to expect principals and schools to raise formally-stated objections. They should be empowered to do so by more transparent access to the mechanics of ICSEA</p>
<p>1.6 The ethics in the comparisons of schools encouraged by <i>My School</i></p> <p>Professor Barry McGaw has stated that “Ethical, evidence-based reasons for school-to-school comparisons exist”⁹</p>	<p>Can ACARA explain what it considers to be “ethical evidence-based reasons”? What are the ethics involved in</p>	<p>In the development of <i>My School</i> did the Deputy-Prime Minister or ACARA consider that <u>fine</u> distinctions would be made between schools (e.g. by parents or</p>

	comparing schools which can be easily demonstrated to be quite <i>unlike</i> on a range of relevant, but completely unaccounted, criteria?	by the constructing of league tables) on the basis of <i>My School's</i> coarse measures of their alleged similarity? If not, why not? If so how much consideration was given to issues such as fairness in the case of schools likely to be maligned by misuse of data on <i>My School</i> ?
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2. General limitations of NAPLAN tests

The NSWSPC believes that the appropriation of NAPLAN tests to rate school achievement and compare schools, purposes for which they are not designed, has considerable downsides. This section of the NSWSPC submission provides information on some aspects of the reliability and relevance of NAPLAN testing.

Issue	Response from the NSWSPC	Additional comment and questions
<p>2.1 Claimed reliability of single point-in-time testing</p> <p>The NAPLAN testing regime is now used for a variety of purposes. Education programs are devised on the basis of NAPLAN test results, large amounts of funding are provided to schools accordingly and assertions are made as to school effectiveness using a single measure of performance gathered at two year intervals.</p>	<p>In most human endeavours the assessment of a skill or set of skills once every two years to determine proficiency would be considered totally inadequate and vulnerable to inconsistencies and vagaries in performance at any specific point in time.</p>	<p>What evidence exists for the reliability and efficacy of single point-in-time testing, undertaken by students every two years, in adequately assessing the acquisition of key academic skills and understandings for any of the purposes cited and in particular for deriving measures of school effectiveness?</p>
<p>2.2 Relevance of NAPLAN to future student success</p> <p>The relationships between NSW basic skills testing and student performance in School Certificate tests, analysed in previous years, show that the literacy and numeracy tests provided only a moderate indication of student academic performance in later years.</p> <p>Further, it was unclear as to whether this modest link should be attributed to a student's general growth in learning capacity as opposed to the acquisition of the specific literacy and numeracy skills being measured by the tests.</p>	<p>In the light of this does current NAPLAN testing provide a sufficient basis on which to tailor education programs for students in order to meet their future learning needs?</p> <p>What evidence is there that literacy and numeracy test results of the type attained in NAPLAN have a direct, significant and meaningful relationship with academic success in later years?</p>	<p>This suggests another reason why considerable caution has to be applied if NAPLAN scores are going to be used to attribute success or shortcomings to a school.</p> <p>Notwithstanding the critical importance of literacy and numeracy, to what extent will high stakes NAPLAN testing impact on other curricula which demonstrably engages students and develops talent and self esteem?</p>
<p>2.3 Narrow focus of NAPLAN tests</p> <p>The Deputy-Prime Minister has frequently referred to <i>My School</i> and NAPLAN allowing "sunshine" to play on school results and performance, with increasing transparency and accountability.</p> <p>The nature of current NAPLAN testing offers a limited opportunity for students to demonstrate a broad range of skills.</p>	<p>The NSWSPC would argue that NAPLAN is a spotlight, not sunshine: it illuminates what is intended but can leave surrounding areas of school and student performance in the dark.</p>	<p>While the NAPLAN data is sound for the purposes for which it was designed (and when used in the context of other data) it is palpably NOT sufficient to stand up ethically, statistically, or in any other way as a stand-alone comparator of schools. (See Section 3)</p>

<p>2.4 Teaching to the test and narrowing the curriculum</p> <p>Substantial arguments have been raised by various groups and in research about these issues.</p>	<p>The NSWSPC is very concerned about this issue. However it is confident that in both submissions and in hearings the Inquiry will receive ample evidence about these impacts of high stakes testing. Certainly this evidence is readily available in developments in the United States and in England.</p>	<p>NSW secondary schools also provide evidence of the impact of high stakes testing of core subjects as distinct from electives such as art, music and languages. This has reduced the number of elective lines from three or four down to just two in most schools, with an impact on student choice, interest and engagement.</p>
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3. Using NAPLAN to compare schools

The use of NAPLAN to compare schools is problematic on a number of fronts. Student participation in the tests is uneven, many year cohorts are too small and measurement error is far too great for the purpose for which NAPLAN has now been appropriated. The use of Year 7 NAPLAN scores for this purpose is seriously flawed and challenges even the most basic claims made about *My School* by both ACARA and the Rudd Government.

Issue	Response from the NSWSPC	Additional comment and questions
<p>3.1 Measuring school performance</p> <p>In referring to NAPLAN, the Deputy-Prime Minister has stated that: “These school results provide a valuable indicator of school performance.”¹⁰</p>	<p>The mean score is not by itself a reliable measure of school performance. When combined with the distortion introduced by an unreliable ICSEA measure, it can be completely misleading.</p>	<p>A related issue (see 3.6) is the creation of league tables out of NAPLAN test scores for just one year.</p>
<p>3.2 Varying participation in the NAPLAN tests</p> <p>The Deputy-Prime Minister (April 2010) has stated that: “All students in Years 3, 5, 7 and 9 in government and non-government schools sit the NAPLAN tests.”¹¹</p> <p>The Deputy-Prime Minister has also stated that: “Students with severe intellectual or functional disabilities or students from a non-English speaking background who have been learning English in Australia for less than one year are eligible for exemption however this is not automatic and parents may choose for their child to participate.”¹²</p>	<p>Participation rates show significant variations between schools, systems and states. For example, Steiner schools in some parts of NSW had low participation rates. Of the major states, Victoria was significantly below NSW in participation.</p> <p>But the inconsistent treatment of the scores of these students, as well as those schools who select exceptionally gifted students, is yet another source of uncertainty and unreliability in the published data when only average scores are presented</p>	<p>ACARA seems to be aware of variations in participation rates between schools, systems and even states - and changes to <i>My School</i> will be made to allow for these differences. But will ACARA monitor practices such as excluding particular students from the tests?</p> <p>Does ACARA know the extent to which some schools may seek to discontinue the enrolment of students who don't perform well? While not easy to quantify, this practice is well known in the transition of students from Year 10 to HSC/VCE studies.</p> <p>Research on retention rates in New York strongly links falling retention to such deliberate shedding of enrolments – all in the shadow of high stakes testing.¹³</p>

<p>3.3 The problem of small cohorts of students</p> <p>There are serious limitations in using average scores to represent overall performance of a group of students within a school and even more so in the case of very small groups. Average results often disguise large differences within and between groups. There are far superior measures which are available to better reflect group performance.</p>	<p>Given the limitations that exist in reporting average test scores, particularly in relation to small cohorts, how can ACARA justify reporting simple averages for comparison purposes?</p>	<p>For the more prestigious examinations such as the HSC in NSW, cohorts with fewer than 10 are not reported for reasons of privacy and statistical integrity. This practice has been developed over 15 years and should inform the integrity of the ACARA position.</p>
<p>3.4 The problem of measurement error</p> <p>The differences between schools being reported on <i>My School</i> take no account of measurement error, which means that such differences cannot be interpreted as being significant or meaningful with any great confidence. In fact, experience with such measures in major NSW testing indicates that the only differences that can be observed with any real confidence are those between the top 10-15% of schools and the bottom 10-15% of schools. All other differences are considered to be unreliable.</p>	<p>Is ACARA aware of the limitations of the data for asserting meaningful differences in results between schools and also between school average results and national averages?</p> <p>In the light of findings such as those in NSW testing, how can ACARA invite, condone or support the fine degree of school comparisons that are currently being made with <i>My School</i> data?</p>	<p>The government, through ACARA, is presenting unsound data to the public as reliable, relying on and fostering naïve understandings of what numbers mean. The NSWSPC believes that ACARA should only use measures it knows to be statistically valid and reliable and to accept the task of educating students, parents and the community to understand them</p>
<p>3.5 The use and misuse of Year 7 NAPLAN results</p> <p>ACARA seems to be confused as to how long students have to attend a school for their results in a NAPLAN test to be fairly attributed to the difference made by their school?</p> <p>In relation to students in Year 7, the performance of students in schools where Year 7 is the final year of primary school is presently being compared with schools where Year 7 is the first year of high school.</p> <p>In relation to the above, Dr Peter Hill has said:</p> <p style="padding-left: 40px;">“it would be naïve to suggest, in the case of the performance of Year 7 students in their first year of secondary schooling, that secondary schools can have a significant positive or negative influence over student performance in the three months that the students are at the school”¹⁴</p> <p>Professor Barry McGaw has stated:</p> <p style="padding-left: 40px;">“It would be good to exclude students who are new to a school” and that it is “important to include only those students who have been in a school long</p>	<p>But <i>My School</i> <u>does</u> include Year 7 NAPLAN scores as a legitimate measure of a school’s “positive or negative influence over student performance”.</p> <p>In the light of Dr Hill’s comments will this data now be removed from the website? Or in states where Year 7 is the first year of high school will the Year 7 NAPLAN scores be recorded for each student’s previous school?</p> <p>Will the Government now agree to exclude such students, including Year 7 students in states where Year 7 is the beginning year of secondary school? Will they move to exclude the results of newly enrolled students, in</p>	<p>Did ACARA advise the Deputy-Prime Minister that it would be a naïve, unwise or an otherwise flawed move to include Year 7 NAPLAN scores?</p> <p>What specific instructions were given to ACARA on this matter?</p> <p>In the light of the observations made by these two top bureaucrats will the deputy-Prime Minister now ensure that <i>My School</i>, at the very least, acknowledges on the website that any conclusions or</p>

enough for the school's influence to have an effect" ¹⁵	any year, from the NAPLAN data on <i>My School</i> ?	comparisons derived from Year 7 results will not be reliable?
<p>3.6 Using just one year's results to compare schools</p> <p><i>My School</i> currently provides results for 2008 and 2009 but comparisons between schools are derived from the scores of just one year. Any scrutiny of <i>My School</i> clearly shows that there can be considerable fluctuations in school NAPLAN scores from one year to the next.</p>	Which NAPLAN results, 2008 or 2009, represent the most reliable basis for the comparison of one school with another? Is it possible to say that test results for just one year provide an acceptable level of reliability? If not, why has ACARA encouraged comparisons between schools to be made on results for just one year?	<p>Can the <i>My School</i> website be modified NOW to average out the NAPLAN scores for more than one year to reduce the impact of year-by-year fluctuations?</p> <p>The WA model says that patterns of educational performance on external tests cannot be accurately predicted unless there is 5 years of data for a cohort (eg Yr 9) in a school (Wildy & Louden)</p>
<h2>4. Developing ICSEA</h2> <p>Personnel in the top management of ACARA have made considerable contributions to our understanding of schools. Dr Peter Hill's work in particular has thrown the spotlight on the fact that the differences between classrooms are greater than the differences between schools. Professor Barry McGaw has frequently stated that 70% of the difference between schools is explained not by what they do as schools but by who they enrol. ICSEA was developed in an effort to isolate some of these effects and enable fairer comparisons between the work of different schools. Yet in the process it used to calculate the ICSEA, ACARA has failed to create anything like a sufficient basis for fair comparisons between schools.</p>		
Issue	Response from the NSWSPC	Additional comment and questions
<p>4.1 What ICSEA is and what ICSEA isn't</p> <p>ACARA has stated that ICSEA is "a measure of the socio-educational background of the students that attend particular schools"¹⁶</p>	It isn't. Why does ACARA make this claim when ICSEA is instead a <u>proxy</u> measure of census collection district (CCD) characteristics, not particular school enrolments?	.
<p>4.2 The accuracy of ICSEA</p> <p>Since family data for the students actually enrolled in schools was not available nationally, ABS averages of SEIFA variables were used to arrive at an ICSEA value for each school.</p> <p>Given that much of the claimed usefulness of the <i>My School</i> website centres on the comparison of schools having similar ICSEA values, the accuracy of the ICSEA is of crucial importance.</p>	Is the Deputy-Prime Minister aware that the ABS advises against applying averages, such as those used to create ICSEA, to individuals? ¹⁷ Did ACARA consider this advice? Were any formal studies undertaken to assess the reliability of using ABS averages of the SEIFA variables in calculating the ICSEA for individual schools? If so, what were the results of those studies?	Perhaps the most glaring example of the proxy nature of ICSEA lies in the fact that ACARA attributes the same average ICSEA for each of the often very different campuses of multi-campus colleges. Examples include the campuses of Tuggerah Lakes Secondary College and Callahan College in NSW
<p>4.3 Overstating and understating the SES of school enrolments.</p> <p>The census does tell us more about the family profile of children in each CCD who attend government and non-government schools, and it certainly challenges the</p>	Clearly the families in any neighbourhood are not the same, and their children are often divided off into very different schools. These schools	To what extent does <i>My School</i> systematically overstate the ICSEA values of public schools and understate the ICSEA values of

<p>averages used by ACARA.</p> <p>In a 2004 <u>study</u> of the Penrith Statistical Local Area Barbara Preston revealed that, if it drew from just the ten most disadvantaged CCDs, a public school would have sixteen disadvantaged (low family income) students for every one advantaged (high family income) student, while an independent school drawing only from the same CCDs would have equal numbers of disadvantaged and advantaged students.¹⁸</p>	<p>cannot be accurately described, as they are by ICSEA, in terms of CCD averages. Schools with the same or even similar ICSEA values may not be similar at all.</p>	<p>private schools? What steps will ACARA urgently undertake to research, clarify and remedy this matter?</p>
<p>4.4 Modifying ICSEA</p> <p>Some state or system authorities were given the opportunity to review the draft ICSEAs for their schools and to provide advice about instances where they believed the ICSEA value for a particular school was incorrect.</p>	<p>Which system authorities were afforded this opportunity and what proportion of school ICSEA values in each jurisdiction were modified? What happened in the case of non-systemic, private schools?</p> <p>What subsequent action was taken where those authorities flagged a concern? Specifically, what data and mechanisms did ACARA use to arrive at the "revised" ICSEAs?</p>	<p>It seems now that some school ICSEA values used on <i>My School</i> remain as proxy measures and others are derived from more school-specific enrolment data. Can ACARA be certain that the opportunity to have school ICSEA values adjusted has been taken up evenly and on a comparable basis? What effect does this have on the validity of school comparisons, especially across states/jurisdictions?</p>
<p>4.5 One size fits all?</p> <p>Professor Barry McGaw has stated that ICSEA "does not fit some schools well"</p> <p><i>And that:</i></p> <p>"variation in school ICSEA means accounts for more than 60 percent of the variation in school NAPLAN means. That shows that the ICSEA scale is very well fitted for the purpose for which it was used."¹⁹</p>	<p>In developing ICSEA were different processes used for certain states and systems, depending on which data happened to be available to system authorities?</p> <p>The assumption is that the residual differences in performance are made up entirely by what the school does. But this submission details many other, unaccounted factors which impact on school test scores.</p>	<p>For many reasons, including the provision of choice, Australia has developed considerable diversity in the provision of schools in Australia. This diversity places substantial and additional responsibility on governments to make sure that any comparisons between schools are valid. The problems evident in <i>My School</i> suggest they have a long way to go.</p>
<p>4.6 Adjusting ICSEA</p> <p>ACARA has adjusted ICSEA values for a large number of schools.</p>	<p>Is it correct, as studies by the NSW Secondary Principals' Council have asserted, that the ICSEA values for some schools were adjusted by more than 100 points? What was the largest change made? What was the smallest?</p>	<p>It is most concerning that ACARA needed to offer school systems the opportunity to "correct" its calculations to this extent. If this was necessary, what are the implications for the reliability of the ICSEA values on the <i>My School</i> website? To be specific, what statistical error would ACARA expect in the ICSEA values, taking into account all of the uncertainties in the data ACARA used to calculate them?</p>

<p>4.7 Impact of pre-publication changes to ICSEA</p> <p>The significance and the timing of changes to ICSEA raise many questions.</p>	<p>Is it true to say that, for schools around the middle of the distribution, let's say, the middle third of schools, a shift of as little as two or three ICSEA points would mean that the set of "statistically similar" schools to which they would be compared could change completely?</p> <p>Is it true to say that this degree of shift could potentially alter the colour of the bands that were used on the website to characterise the performance of these schools against the allegedly "similar schools"?</p> <p>Is it true to say that a shift of, for example, around 100 ICSEA points [or otherwise, the maximum value from the response to 4.6 above] could change the colour of the banding on the website from red (ie <i>substantially below the similar schools</i>) to dark green (ie <i>substantially above the similar schools</i>) or vice-versa?</p>	<p>Should we presume that, if system authorities had not been in a position to flag these amendments, perhaps because they did not have appropriate data available, then the draft ICSEA figures would have been published, with the inaccuracies not addressed? If the systems' information was sound enough to correct ACARA's calculations, why was it not used in the first place?</p>
<p>4.8 Which comparisons are correct – My School or the Victorian school performance summary?</p> <p>It seems that two different methodologies, developed to enable comparisons of schools, have come up with different "statistical similarities". Oberon High School in Victoria has an ICSEA of 1065 and <i>My School</i>²⁰ claims its Year 9 reading is <u>below</u> statistically similar schools. BUT the Victorian school performance summary website has it <u>above</u> similar schools.²¹ The two methodologies also come to different conclusions in the case of four other schools in the Geelong area.</p>	<p>In the development of ICSEA to what extent did ACARA consider the methodology used in the Victorian school performance summary?</p> <p>How does ACARA now view its assertions about the statistical similarity of each school in Victoria in the light of the sometimes different advice provided on the Victorian website?</p>	<p>Which system of comparisons with "similar schools" would ACARA recommend to the undoubtedly confused parents in Geelong?</p>

5. What ICSEA doesn't include

If school principals had been effectively consulted in the development of *My School* they would have alerted ACARA to the range of factors at the school level which impact on the achievement profile of any school. Some of these are easily measurable – others are not. Unfortunately ACARA proceeded, not only by using proxy rather than direct measures, but by avoiding anything that couldn't easily be reduced to numbers. The results are easily seen in the flawed and in some cases demonstrably absurd comparisons between schools.

It is important that the focus on the wide range of factors which impact on school performance should not be seen as excuse-making for schools. There is no excuse for teachers and principals who do not do their very best for the students in their care - but we need to accurately identify the schools where this may or may not be happening. To do this we have to understand everything which impacts on the achievement profile of schools. This section considers some of those impacts which the Deputy-Prime Minister and/or ACARA either didn't know about, or chose to ignore.

Issue	Response from the NSWSPC	Additional comment and questions
<p>5.1 The gender mix of enrolments</p> <p>The gender mix of enrolments can impact on the achievement profile of a school. This mix often varies between schools, but ACARA did not take this factor into account. There is ample evidence, even on the <i>My School</i> website (by comparing boys' and girls' schools) that the achievement profile of boys and girls can be significantly different.</p> <p>For example, notwithstanding other differences between the schools, ACARA apparently believes that it is "fair and meaningful" to compare the NAPLAN results of Asquith Boys High School with those at Methodist Ladies College Burwood (both in NSW). The comparison is clearly not fair and meaningful for a number of reasons. Any such comparison places Asquith Boys High School at a severe disadvantage.</p> <p>In response to this issue Dr Peter Hill states:</p> <p style="padding-left: 40px;">"ACARA will be looking at possible enhancements to the site for 2010 with the possibility of grouping certain kinds of schools in particular ways, for example single sex schools and academically selective schools"²²</p>	<p>The response from Dr Hill suggests that ACARA sees this as a problem but one which only relates to single sex schools. The reality is that the gender ratio can vary considerably between schools (see next column).</p> <p>Dr Hill's response suggests that ACARA does accept that the gender ratio in school enrolments has an impact on the academic profile of a school. But it comes across as somewhat deficient to refer to <u>possible</u> "enhancements" - when some schools have been unfairly maligned and possibly damaged in league tables as a consequence of this omission.</p>	<p>The impact of an uneven mix of boys and girls in secondary schools is especially marked in places where there are more single sex girls' than single sex boys' schools. This is found in areas such as northern Sydney or Geelong. Quite commonly boys' schools have been closed over the years and this has distorted the balance of boys/girls in the nearby co-educational schools.</p> <p>ACARA has clearly not understood the full ramifications of what amounts to its neglect of this factor.</p>
<p>5.2 The use of selection tests at a school or system level.</p> <p>The use of selection tests at a school or system level certainly impacts on the achievement profile of a school, but ACARA did not take this factor into account. This issue was one of the few taken up by the mainstream media.</p> <p>Example: According to <i>My School</i>, Katoomba High School is statistically similar to St George Girls (selective) High School. ACARA promotes the belief that the student intake of both schools is statistically similar and that they can be compared. This is false and the first-mentioned school and its community is damaged by any such comparisons.</p>	<p>See Dr Hill's response to the previous issue. Again the casual reference to "possible enhancements" fails to address the very real concerns felt by schools on this issue. Even the mainstream media took up the issue of comparing selective schools with comprehensive schools.</p>	

5.3 School-level discrimination in enrolments

It seems that little or no consideration was given to the extent to which the following enrolment discriminators might impact on the actual enrolment of any schools:

- The charging of different levels of fees and contributions
- Questions asked of prospective students and/or their parents
- Other restrictive enrolment criteria, both overt and covert

Example: Both Gloucester High School and Medowie Christian School in NSW (and in the same federal electorate) have the same ICSEA value. While Gloucester High must take local students almost without condition, enrolment at Medowie is subject to 33 conditions, mentioned on one of the five forms parents must complete if they can pay the fees and if they are granted an interview.

These two schools are clearly not “statistically similar in terms of their student intakes”. One of them is clearly disadvantaged in the comparisons encouraged by ACARA.

Professor Barry McGaw states:
 “at present the site depends on the school description to report on any selection process. Having ACARA collect this information formally and report it on the website is a good idea that we will pursue”²³

But in the same letter Barry McGaw states that “It would be a mistake to consider operational features in determining likeness” between schools. It seems that ACARA believes that “operational features” do generate “some of the differences among schools” but that this “should be made evident and not adjusted out of sight prior to comparisons being made among schools”

But in an acknowledgement that such problems are very real, Professor McGaw also states that ACARA “will move to using growth measures as soon as practicable.”

Perhaps it might have been more useful for such “good ideas” to have seen the light of day prior to the development of *My School*.

But such “operational features” can have a substantial impact on the enrolment profile of a school and certainly help determine the extent of any “likeness”.

It is not good enough for ACARA to say that high impact measures such as overt and covert selection mechanisms used by schools should be simply mentioned somewhere on the website but not factored into any adjustment of statistical similarity.

ACARA needs to commission research to find out the impact of such “operational features” on the achievement profile of different schools and the subsequent implications for ICSEA and the comparisons between schools encouraged by *My School*?

Recurring references by governments and by ACARA to forthcoming improvements to *My School* are always welcome - but might be more welcome if accompanied by acknowledgement that some schools are currently being unfairly compared. A statement to that effect should be included on the current website.

<p>5.4 The ethnic balance and origin of enrolments.</p> <p>The origin and ethnic balance of a school's enrolment can make a significant contribution to the achievement profile of a school. Newly arrived students might range from refugees adjusting after years of personal trauma to the children of highly sought-after (under the points system) skilled and professional migrants. The profile of a school where many families have endured poverty and civil war is going to be very different to a school where students come from aspirant families in countries with strong schools. The profile of schools will certainly vary according to the mix.</p> <p>As if to neutralize this as an issue Dr Peter Hill states that</p> <p style="padding-left: 40px;">“as a general category, students from language backgrounds other than English actually outperform English language background students.</p> <p>This misses the point, which is about large variations among these students.</p> <p>However Dr Hill adds:</p> <p style="padding-left: 40px;">“Clearly, however, this does not apply to every language background group”²⁴</p> <p>Professor Barry McGaw has stated that</p> <p style="padding-left: 40px;">“ACARA is investigating ways in which information on students from non-English-speaking backgrounds can be obtained from schools”²⁵</p>	<p>This response strongly suggests that ACARA was and is aware of this as an issue. If so, what effort was made prior to the posting of <i>My School</i> to allow for differences in ethnic balance and origin? If ACARA knows that the ethnic origin of enrolments does impact on the achievement profile of a school why does <i>My School</i> currently encourage people to compare schools which may have a very different enrolment profile?</p>	<p>Again it seems to ACARA that a belated concession and a vague commitment is enough to compensate for what may for some schools have been humiliating and improper comparisons encouraged by <i>My School</i>.</p>
<p>5.5 The turnover of enrolments</p> <p>According to the school's Principal, over half of the current Year Ten students at Marsden High in Sydney were enrolled somewhere else when they were in Year 7.</p> <p>One-third of the students who sat for the Year 9 NAPLAN tests in 2009 had only been at the school for twelve months.</p>	<p>In the case of newly enrolled students why is their new school being credited with, or blamed for, their results?</p> <p>Both Dr Hill and Professor McGaw have acknowledged that this as an issue but there seems to be no plan to incorporate this factor into <i>My School</i>.</p>	<p>The issue remains: how can ACARA justify the comparison of schools' performance based on test scores when significant numbers of students are mobile between schools and may not have spent sufficient time in the school which is being judged by their test scores?</p>
<p>5.6 Can ICSEA take all this into account?</p> <p>ACARA needs to determine and state its position on whether it can adequately take into account all the factors mentioned in this section.</p>	<p>If it cannot, it begs the question as to whether school comparisons based on elementary NAPLAN statistics can ever be sufficiently fair and meaningful to be published</p>	<p>If ACARA believes that some or all of the likely impacts on NAPLAN results outlined above are worth considering then there is an ethical problem in leaving the website in its</p>

	nationally? Is ACARA able to take such concerns to the Deputy-Prime Minister? Have any such concerns been expressed to date?	current and deficient form - some schools are clearly not being subject to "fair and meaningful" comparisons in the present circumstances.
5.7 ACARA advice to the Deputy-Prime Minister The Deputy-Prime Minister strongly supports <i>My School</i> in its current form, including the use of ICSEA to allow comparison of schools.	Given the high stakes associated with the ICSEA comparisons and the evident unreliability of the measurement systems available to ACARA, what advice did ACARA provide to the Deputy Prime Minister in respect of matters raised in 5.1, 5.2, 5.3, 5.4 and 5.5 above, and generally about the reliability of the ICSEA?	

Future directions of My School – comments by the NSWSPC

The planned changes to, and future directions of, My School were flagged by the Ministerial Council for Education, Early Childhood Development and Youth Affairs FOURTH MCEECDYA MEETING, 10 June 2010, in Perth²⁶.

The NSWSPC notes some new decisions which have been made. These are shown in italics and are followed in each case by a comment by the NSWSPC:

1. *The implementation of "a comprehensive communication strategy for parents and to provide Ministers with advice on ways further to strengthen security and test administration protocols".*

The NSWSPC welcomes assurances about the test but nothing in the announced changes addresses the concerns raised in Section 2 of this submission.

2. *Action to minimize the potential of external agents creating league tables.*

This has the potential to slow down the creation of league tables and is welcome if it can restrict the misuse of data, especially raw data, by unscrupulous interest groups.

3. Changes to the Index of community socio-educational advantage (ICSEA)

- *Obtain updated and comprehensive home address data for all students.*

Highly desirable if we are persist with this model.

- *Use student-level data on occupation and education level of parents/carers where these data are available and can be shown empirically to correlate more highly with NAPLAN than estimates of socio-educational advantage derived from ABS data for Census Collection Districts in which students' home addresses are located.*

The ICSEA-related problems cited in this submission would suggest that such student-level data will always "correlate more highly with NAPLAN". But any ICSEA which is made up of a mix of such data (where it is available) and proxy CCD data (where it is not) will always be problematic.

- *Include within the formula to calculate ICSEA, a variable to capture the effect of language background other than English.*

If this variable is to be generic across all language backgrounds then it will be of little use. As this submission suggests, the need is for ICSEA to capture and allow for the often considerable differences between language and cultural groups.

- *Clarify the process for quality assuring ICSEA values for individual schools where the initial estimate is shown to be inappropriate and provide schools with clear support in this process.*

As it stands this statement is not clear. If some credibility is going to be created for ICSEA, the process needs to:

- ensure that accurate information is collected about all enrolled students
- be consistent across all schools and systems,
- involve consultation with each school
- be made transparent.

What “support” will be provided? **Each school needs an absolute assurance that its ICSEA value will accurately account for every external factor which impacts on student and school achievement. Anything less is simply not acceptable.**

- *Where initial estimates of schools’ ICSEA are adjusted, make corresponding adjustments to the distribution of students’ ICSEAs or, where such adjustments cannot be made, do not publish the distribution by quarters.*

This statement is also not clear. The NSWSPC notes that following the posting of *My School* many ICSEA values were adjusted without changing the quartile distributions. After the NSWSPC alerted ACARA to the problem the quartile distributions were deleted for the adjusted schools. Schools have a right to assurance that any adjustment of ICSEA and adjustment of the distribution by quarters is consistently based on student-level data – and that the process is the same for all schools which are compared using ICSEA.

4. Reporting of results

- *Allow users to refine the list of statistically similar schools using filters, or provide lists of like schools using analytic methods.*

This raises many more questions than it answers. How many filters will be provided and what exactly will they filter? If accurate ICSEA data can be generated, as ACARA claims, filters for different types of schools might be of value. But the filters would still need to be sufficient in number to account for all the real differences between schools. Any filtered list of genuinely statistically similar schools may end up being very small.

The NSWSPC suggests that the money and energy invested in this process would be far better spent in developing high quality growth data reporting for each school and supporting more valid comparisons on this basis.

- *Provide a filter to see school averages for all students in the school or for all students excluding students with learning difficulties.*

This would be an improvement but it raises the question of which other students could be filtered out in similar ways. Why not enable users to see school averages adjusted for gender balance? Perhaps users of *My School* should be able to see a school average that does not include newly enrolled students? The points raised in this submission suggest that considerable adjustments to school averages should be made on the basis of many factors.

- *Provide a facility for schools to provide a brief commentary on their NAPLAN results.*

This might be possible if it will be accompanied by protocols for all schools and sectors but it is a second best solution. Is it the prime responsibility of each school to comment on, or properly contextualize, their NAPLAN results? Surely having made the decision to use NAPLAN to compare schools it is the responsibility of the Rudd Government and ACARA to make sure that the process and product reflects the highest possible reliability and validity.

If it cannot be done properly then it shouldn't be done (in this way) at all. It is certainly not good enough to create a flawed instrument – but one on which parents are encouraged to rely - and then belatedly allow schools to make some qualifying comment.

Will schools be allowed to make a brief commentary such as:

“There are many things which impact on student performance. Only some of them are calculated into this website. Hence comparisons between schools encouraged by this website are likely to be invalid”?

- *Display more prominently information about student absences, withdrawals and exclusions from NAPLAN testing.*

If the display of information is to be properly reviewed the NSWSPC prefers that prominence be given to information which is accurate, reliable and contextualized.

Previously announced MCEECDYA initiatives

As far as other issues surrounding *My School* are concerned the NSWSPC notes that the MCEECDYA communiqué simply repeated previously announced (2009) initiatives.

These are as follows (in italics), with comments by the NSWSPC:

1. School income information will be published on the My School website

Apparently this will be via a “nationally comparable indicator for school income”. The concern of the NSWSPC is that in our diverse framework of schools not all school income is “comparable” between schools. Schools with private income derive some of this from sources which are not at all comparable across schools and sectors. Many public schools receive grants which have no equivalent in non-government schools. If income from all sources is not declared for each and every school then “comparability” will have much the same integrity and efficacy as the comparability allegedly facilitated by ICSEA.

2. Nationally comparable senior secondary outcomes information will be included.

The NSWSPC is completely opposed to the use of ATAR scores as they draw on different models of curriculum and assessment of subjects in each state. The VCE does not require study of as many subjects as the HSC and is considered “less rigorous” especially as NSW has an HSC for all and avoids “streaming”. If genuine comparability can be assured the NSWSPC may support including publishing senior secondary outcomes in the context of value-added.

3. ACARA is to “investigate the feasibility of a national satisfaction survey of parents, teachers and students to enable nationally comparable satisfaction information to be published on the website.....”

The NSW supports this development, provided it is done consultatively and provided it does provides “nationally comparable satisfaction information”.

4. The contextual information about a school will include “information about the percentages of students with disabilities and students with a language background other than English in each school”.

The information about students with disabilities is welcome but just including the percentage of students with a language background other English does not address the concerns we have raised in 5.4 above.

5. The My School website “will be able to show growth measures”.

There is no indication of how this will be done, the extent to which such measures will be shown and whether the current misleading representation of NAPLAN will be modified as a result. While there are problems in presenting growth measures such data can potentially remedy some of the flawed comparisons facilitated by ICSEA. ACARA should certainly be required to consult widely with schools on the proposed model and view to be used. It should be given time for critical feedback and consideration of research on the use of growth measures.

6. Information on proportion of teachers at each level of expertise in the national certification/registration standards will be published when standards are in place.

The NSWSPC has no objection to this information about each school being made available.

7. ACARA will investigate the feasibility and desirability of drawing SES data on student background from parents at schools as an alternative to using data from the ABS.

The NSWSPC position is that student enrolment data for each student in each school must be collected and required as a prerequisite for a number of reasons, including funding. It is quite stunning that we should be reminded that the education ministers across Australia have long known that the proxy SES data to be used by ACARA was not going to adequately support accurate and meaningful comparisons between schools. Why was the decision made to allow *My School* to proceed - in the certain knowledge that the methodology was not adequate to the task?

Conclusions

This submission has focused on conflicting claims about the publication of NAPLAN results on the *My School* website. This submission shows that there are many conflicts between claims made by the Government and ACARA on the one hand, and the profession - including and especially principals - on the other. There are also differences between what the Government claims about *My School* and what senior ACARA bureaucrats know, and sometimes say, about it. It raises many more questions than answers. This submission asks around eighty of these questions

The *My School* website - and the way it uses NAPLAN test scores - shows all the features of an initiative that was driven by a political agenda in far too short a time frame, in the absence of meaningful consultation and probably in part against the advice of those responsible for its development.

The Minister responsible, MCEECDYA and ACARA have all stressed that there will be changes made to *My School* and that it is in continual development. This is poor compensation to those schools and communities which have been shamed by the comparisons encouraged by *My School* and supported by a methodology that the NSWSPC strongly asserts is substantially flawed. Parents and the community have been encouraged to make fine distinctions between schools on the basis of a coarse methodology.

When it comes to publicly comparing schools, close enough is simply not good enough. The NSWSPC will continue to offer advice to ACARA on how *My School* can be improved, but this improvement cannot effectively be achieved within the parameters laid down by the Deputy-Prime Minister – especially the stipulation that nothing will be taken off the website. The issues mentioned in this submission raise considerable doubts that even a more sophisticated ICSEA can adequately account for the real differences between schools, differences well known to parents, teachers and principals.

Notwithstanding anything in this submission the NSWSPC is committed to rigorous, accurate and meaningful accountability of schools. The current process, represented by the publication of NAPLAN on *My School*, fails to achieve this.

The NSWSPC accepts the value of large cohort testing as a way to improve learning and to identify areas for systems and ACARA to address in the development of future curriculum. But large cohort testing has limited value in improving the performance of schools. While it is outside the terms of reference of this Inquiry the NSWSPC believes that there are better mechanisms to ensure the accountability and performance of schools, mechanisms that are well-supported by evidence from within Australia and from overseas. These include widespread availability of comprehensive and reliable information about schools, but information which is supplemented by independent and professional appraisal of schools. The Australian and State Governments need to do much better than *My School* and could make a useful start by engaging meaningfully with school principals.

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- ¹ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010
<http://www.nswspc.org.au/images/news/ACARAresponse270410.pdf>
- ² ACARA Media Release January 28
- ³ Letter from Dr Peter Hill, CEO of ACARA to Chris Bonnor, May 3, 2010
- ⁴ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010
- ⁵ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010
- ⁶ The Deputy-Prime Minister The Hon Julia Gillard MP in a question and answer document distributed to members of parliament, April 2010
- ⁷ The Deputy-Prime Minister The Hon Julia Gillard MP
- ⁸ The Deputy-Prime Minister The Hon Julia Gillard MP
- ⁹ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010 *Note that it was the question asked by the NSWSPC which referred to ethics.*
- ¹⁰ The Deputy-Prime Minister The Hon Julia Gillard MP
- ¹¹ The Deputy-Prime Minister The Hon Julia Gillard MP
- ¹² The Deputy-Prime Minister The Hon Julia Gillard MP
- ¹³ <http://www.nytimes.com/2009/04/30/education/30graduation.html>
- ¹⁴ Letter from Dr Peter Hill, CEO of ACARA to Chris Bonnor, May 3, 2010
- ¹⁵ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010
- ¹⁶ Letter from Dr Peter Hill, CEO of ACARA to Chris Bonnor, May 3, 2010
- ¹⁷ http://docs.google.com/fileview?id=0B8UbZRpTft_5NTZmY2ExYmUtMjE2MS00ZjcyLWI5OWQtYTM3MzBINTQ2OGU3&hl=en
- ¹⁸ http://docs.google.com/fileview?id=0B8UbZRpTft_5NTZmY2ExYmUtMjE2MS00ZjcyLWI5OWQtYTM3MzBINTQ2OGU3&hl=en
- ¹⁹ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010
- ²⁰ <http://www.myschool.edu.au/Main.aspx?PageId=0&SDRSchoolId=VICG0071821001&DEEWRId=9563&CalendarYear=2009> Note that ACARA uses a five point scale while the Victorian website uses a three point scale.
- ²¹ <http://www.vrqa.vic.gov.au/StateRegister/Provider.aspx/GetFile?Type=GovernmentSchoolPerformanceSummary&EntityID=1&SchoolNumber=8210>
- ²² Letter from Dr Peter Hill, CEO of ACARA to Chris Bonnor, May 3, 2010
- ²³ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010
- ²⁴ Letter from Dr Peter Hill, CEO of ACARA to Chris Bonnor, May 3, 2010
- ²⁵ Letter from Professor Barry McGaw, Chair of ACARA to Jim McAlpine, NSWSPC President, April 27, 2010
- ²⁶ Ministerial Council for Education, Early Childhood Development and Youth Affairs FOURTH MCEECDYA MEETING, 10 June 2010, Perth – COMMUNIQUÉ http://www.mceecdya.edu.au/verve/_resources/C04_Communique_-_10_June_2010.pdf