

Response to ACARA on the inclusion of SWD data on *My School*

Response by Independent Schools Queensland

Context of Queensland Independent schools

Queensland independent schools comprise non-government schools that are not part of the Catholic school system. They cater for students from varied socio-economic backgrounds and educate almost 118,000 students at 200 schools across more than 220 campuses. This represents 15 per cent of all Queensland school students, and nearly 20 per cent of secondary students in the state.

In 2016, 89% of independent schools are educating more than 3,000 students with disability (SWD) who have a diagnosis recognised by the Queensland Government Education Adjustment Program (EAP). This means that independent schools cater for 34.9% of SWD being educated in Queensland non-state schools.

Response to specific survey questions

Reaction to the proposal to include SWD data on *My School*

Independent Schools Queensland (ISQ) notes that many individual Queensland independent schools have completed the ACARA consultation survey. This response is a summary of feedback provided by member schools directly to ISQ in relation to the proposal to include SWD data on *My School*.

Responses to ISQ about the proposal have been unanimously 'very negative' with most questioning the purpose and value of including SWD information on *My School*.

Respondents believe that presenting the quantitative data in any form is of no value as the data does not reflect the quality of the school's support for SWD. Whereas NAPLAN data can be used to track and improve the results of students and schools, SWD data is not able to be used in the same way. It is not linked to students' achievement and the data is not likely to change over time, as the same students will most likely require similar adjustments over their school life.

The number of SWD able to be successfully accommodated within a school is dependent upon factors such as the resources available, the level of skill of staff and level of parental support. There is no capacity for *My School* to report on these qualitative factors to the audience most likely to use the data – parents.

There are three questions to be considered in relation to the publication of SWD data:

How will publishing the data help the child?

How will publishing the data help the parent/carer?

How will publishing the data help the school community?

Schools could not identify any benefits to students, parents or schools in publishing the data, but were concerned about the potential impact on the students who are reported, their parents and the school communities that cater for them.

Principles that should be satisfied in relation to the proposal to add SWD data to *My School*

ISQ notes the eight principles contained in *Principles and protocols for reporting on schooling in Australia*, June 2009 on the Education Council website which is intended to guide and inform the use and publication of data generated in the process of measuring the performance of schooling in Australia. ISQ is of the view that publication of the SWD data does not satisfy these principles, specifically:

Principle 1: Reporting should be in the broad public interest.

Independent schools strongly question whether the publication of SWD data is in the broad public interest. The public identification of SWD is considered counterproductive and has the potential to undo years of work by schools in making adjustments for students according to their individual needs rather than on the basis of whether or not they have a disability.

Principle 2: Reporting on the outcomes of schooling should use data that is valid, reliable and contextualised.

ISQ notes that a protocol for reporting on Australian schools is for “...disaggregation of data occurring only where the data is assessed as reliable to a suitable level of confidence and valid, and where adequate contextual information is provided to help explain variability in performance’. As the Price Waterhouse Coopers Report on the 2015 NCCD makes clear, the 2015 data is not valid or reliable. None of the proposed options for reporting the data provide an opportunity to present the context of SWD in individual schools.

The effect of this is that there will be schools reporting low numbers (or percentages) of SWD and others reporting 100% due to their context. ACARA should consider what information can be provided to advise parents and the general community about the possible reasons for the wide variations between schools. Option 3 which includes ‘like schools’ comparisons is not sufficient to account for these variables.

Principle 3: Reporting should be sufficiently comprehensive to enable proper interpretation and understanding of the information.

While acknowledging that Options 2 and 3 would provide more comprehensive SWD information, the NCCD categories are not terms familiar to parents and the general community, significantly reducing the likelihood that the data will be properly interpreted or understood.

Principle 4: Reporting should involve balancing the community’s right to know with the need to avoid the misinterpretation or misuse of the information.

Independent schools strongly believe that the SWD data, based on the NCCD which is a broader definition of disability than has traditionally been understood by parents and the general community, will be misinterpreted and misused.

Schools report that some parents already request information about the number of SWD in the school at the time of enrolment, believing that these students take teachers’ time away from their own

children. ISQ is advised that other parents seek out schools with high numbers of SWD believing these schools are better able to cater for their child.

Principle 5: *Schools require reliable, rich data on the performance of their students because they have the primary accountability for student outcomes.*

If *My School* data is intended to be about student performance, there is no basis to include SWD data as it is not student performance information. It is a collection of the adjustments schools are making to accommodate students.

Principle 6: *Parents and families need information about schooling, including data on the performance of their child, schools and systems, to help them to develop informed judgements, make choices and engage with their children's education and the school community.*

The SWD data on its own is of no value and does not support anyone to make an informed judgement. Parents will not know whether a school with a smaller percentage is 'better' than a school with a higher percentage and, as previously discussed, the numbers on their own provide no indication of the quality of adjustments and education a student is receiving at a school.

Parents of SWD included in the NCCD are already actively engaged in their child's education. One of the criteria for a student being included in the NCCD is that the parent has been consulted and that there is agreement that adjustments being made by the school to address the needs of the student. These parents are already in a sound position to make informed judgements and choices about their child's education.

Principle 7: *The community should have access to information that enables them to understand the performance of schools and the context in which they perform and to evaluate the decisions taken by governments. This ensures schools are accountable for the results they achieve with the public funding they receive and governments are accountable for the decisions they take. The provision of school information to the community should be done in such a way as to enhance community engagement and understanding of the educational enterprise.*

The data does not provide information on a school's performance in relation to SWD. Given the low numbers of students at the Substantial and Extensive levels, most schools will have no numbers reported at those two levels, reducing the usefulness of the information available to parents and the community.

Principle 8: *School systems and governments need sound information on school performance to support ongoing improvement for students and schools. They also need to monitor and evaluate the impacts of the use and release of this information to improve its application over time, and to assess and address the outcomes for schools and their students resulting from the public release of this data.*

This data is already available to governments.

SWD data ISQ would like to see included in *My School*

The strong view of Queensland independent schools is that they do not want any SWD data included in *My School*.

Concerns about publishing SWD data on *My School*

While acknowledging the principles and protocols for publishing data on *My School*, including measures to protect student privacy, the potential identification of students and their families is the primary concern expressed by independent schools. Schools are especially concerned that the low numbers of students in the Substantial and Extensive levels could lead to the inadvertent identification of particular students or families.

There is overwhelming concern from ISQ member schools that parents, the media and the general community do not understand the definition of disability used in the NCCD and, therefore, the broad range of students included in the collection. For example, not all students included in the collection have a learning difficulty or require high levels of support. Some students with a disability for whom adjustments are made are high academic achievers. Some students only receive adjustments in some subject areas, not the whole school curriculum. These individual circumstances are not reflected in the SWD data and parents will make assumptions that all SWD are in need of significant support.

Some schools are concerned that independent schools who pride themselves on their inclusive philosophy and report significantly higher proportion of SWD could gain a reputation as being something akin to a special school. This would impose significant additional costs on those independent schools who do not have access to Guidance Officers, mental health experts or other systemic specialist support available to public and Catholic schools.

Schools are also concerned that publication of SWD data and accompanying media coverage could result in the annual NCCD count replicating NAPLAN and becoming a source of angst for students, parents, school communities and school staff.

Response to the three options

Option 1 – Total number of students with disability

Of those schools who indicated a preference, reporting by percentage was the preferred option to maintain consistency with the reporting of Indigenous and Language background other than English student data.

Option 2 – Table of level of adjustment by disability category

Schools overwhelmingly reported that it would not be useful at all except possibly to parents who had a child with a disability and were looking for an appropriate school. But the point was made that the data did not provide information to allow parents to make a judgement about the quality of the adjustments being made at a school.

Option 3 – Charts showing percentages of students in each disability category and level of adjustment against both the national percentages and those for schools of similar school type

Schools overwhelmingly reported that it would not be useful at all and would be of limited value to everyone except parents of children with a disability.

Any problems in comparing these proportions with national proportions and similar schools

The problem most frequently identified to ISQ was that, although there are four levels of adjustment, most schools will only have data in two of the levels. Some schools will also have no data reported in some disability categories for the same reason.

The lack of consistency of the data at a school level makes reporting against national proportions and 'like schools' problematic.

Preferred options for presenting the data

Overwhelmingly, independent schools preferred none of the three options for reporting the SWD data. However, a very small number of responses supported Option 2 for reporting the data on the basis that the complete data set may demonstrate to parents and the community that most students with disability, as defined for the NCCD, did not require substantial or extensive adjustments to be made by the school.

Using Option 3 to report SWD data is not supported given the broad acknowledgement that the 2015 NCCD data is not consistent between education jurisdictions let alone individual schools.

Other suggestions as to how SWD data might be presented on *My School*

ISQ member schools have no other suggestions on the presentation of SWD data on *My School*.

General comments

While recognising that Education Council agreed in 2008 to publish SWD data on *My School*, this decision pre-dates the implementation of the NCCD which captures a broader range of students than was previously reported using previous SWD data methodology. For most parents, SWD is intrinsically linked with a medical diagnosis and targeted funding available to schools for a very small percentage of students with high support needs. Four recent reports, *Supporting Students With Disability in NSW Public Schools* (NSW), *Review of the Program for Students with Disabilities* (VIC), *Schools for All Children & Young People: Report of the Expert Panel on Students with Complex Needs and Challenging Behaviour* (ACT) and *Access to real learning: the impact of policy, funding and culture on students with disability* (Parliament of Australia) clearly outline the difficulties faced by SWD and their parents in school settings.

Without an extensive public education campaign to explain the definitions used for the NCCD, there is significant risk that the data will be misinterpreted by parents, the general public and the media. The data could be interpreted as meaning that there has been an 'explosion' of numbers of students with disability, when in fact the numbers reported reflect the change in definition.

There is acknowledgement by independent schools that researchers and policy makers should have access to the SWD data, but don't believe that schools need to be identified in public documents. Some schools believe that reporting of SWD data shows a great insensitivity to the school communities who are trying to engage and support SWD.

Many Australian schools participated in the NCCD for the first time in 2015 and it is recognised that the resulting data is not consistent. Therefore, publication of 2015 individual school SWD data on the My School is not supported by Queensland independent schools.