

Response to draft Queensland Government response to Review of Queensland senior assessment and tertiary entrance

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Introduction

Queensland Catholic Education Commission (QCEC) is the peak strategic body with state-wide responsibilities for Catholic schools in Queensland. These schools are administered by five diocesan schooling authorities (Brisbane, Cairns, Rockhampton, Toowoomba and Townsville) and 17 Religious Institutes that operate 299 schools altogether. QCEC has delegated roles in relation to liaising with State and Federal Governments, negotiating and distributing government funds to Catholic schools and facilitating collaboration between Catholic schooling authorities to determine planning.

Queensland Catholic Education Commission (QCEC) provides this response to the *Draft Queensland Government response to the Queensland review of senior assessment and tertiary entrance* on behalf of 22 Catholic schooling authorities which operate Catholic schools in Queensland, educating 145,000 students; and specifically on behalf of the 99 Catholic secondary schools, their students, staff, communities and families on whom issues of senior assessment and tertiary entrance processes particularly impact.

In its submission to the ACER Review consultation, QCEC identified three principles¹ underpinning responses to questions of senior assessment and tertiary entrance processes:

- Learning should foster the holistic formation and well-being of the individual student and not be unnecessarily circumscribed by assessment requirements
- Teaching, assessment and tertiary entrance processes should recognise the different needs of students and be equitable in providing access and pathways appropriate to needs of different students
- Equity, fairness and appropriate discernment in providing access to post school pathways serves not just the individual's needs but the common good in supporting productivity, social justice and just and sustainable use of higher education resources.

¹ QCEC notes that the draft government response to the review proposes general principles to guide changes. These are noted as largely operational principles around implementation rather than high level principles to guide decision making in respect to assessment and tertiary entrance.

A cohort of around 10,500 students completes Year 12 in Catholic schools each year. Most recent figures^{2 3} indicate that 66% of these students in Catholic schools received an OP in 2014 and 80% of these received an OP between 1 and 15. However, almost 50% received a VET qualification. Across the state as a whole, just under 40%⁴ of Year 12 completers go on to tertiary education. While some Catholic secondary schools are over-represented in tertiary entrance data, other Catholic schools have significant pathways into vocational education and employment. QCEC seeks solutions and pathways that validly serve the needs of all year 12 leavers. 60% of all Year 12 leavers in Queensland do not enter tertiary education and yet, neither the review recommendations nor the draft government response pay any real heed to the needs of this greater proportion of the school leaver population.

QCEC has very significant concern that there is no evident consideration of providing suitable pathways for students other than those intent on tertiary entrance and undertaking “academic” courses⁵ in school. QCEC contends that focusing only on tertiary entrance as the end goal represents a grave inequality for those many students who are not bound for university and notes with concern the progressive elimination of this group of students from the focus of the review recommendations and now from the focus of the draft government response to the review. The needs of this large group of students must be addressed before this review can be considered as a fulsome response to senior schooling and assessment in Queensland.

QCEC continues to look to the principles identified above (page 1) in providing feedback on the draft government response to the review. There is an underlying concern in responding to the questions posed by the government survey that issues that were left open or unaddressed in the ACER Review recommendations or which required further elaboration and consultation are now being locked in to implementation considerations. QCEC urges the government to give due consideration to the learning and assessment needs of all senior secondary students in Queensland schools.

In providing its response around the format presented in the government survey, QCEC wishes to highlight continuing concern that only part of the senior assessment question is being addressed and increasingly tertiary entrance⁶ is becoming pre-emptive in determining school assessment processes.

Q1. Would you support a managed transition from the OP tertiary entrance rank to an ATAR?

- 1.1. QCEC raises concern at the apparent simplicity of this survey question. Any change to an existing system/systems of tertiary entrance will require a carefully managed and properly resourced transition. The question presumes some agreed determination of ATAR calculation when the ACER Review and the draft government response leave wide open the question of how the ATAR will be calculated. This is a fundamental and influential piece of work yet to be undertaken.

² Year 12 outcomes 2014.

³ The same data reveals that across the state of Queensland the number of students graduating with an OP dropped to 53% in 2014.

⁴ Next Step 2014: A report on the destinations of Year 12 completers from 2013 in Queensland.

⁵ That is, in current terminology, those students who are undertaking Authority registered or VET subjects in school.

⁶ In the course of this review and response, it is noted that the term “tertiary entrance processes” has been subtly changed to simply “tertiary entrance”. The inference may be that this review is now focused on entrance, rather than the required processes. The priority demand from universities for an “ATAR” regardless of how that ATAR was formed may have diverted a fundamental concern of this review.

- 1.2. QCEC supports the government's expressed intent to work collaboratively with key stakeholders to consider minimum subject requirements for the calculation of an ATAR, acknowledging that this determination will have backwash effects into school subject offerings⁷.
- 1.3. QCEC acknowledges the demand from the tertiary sector for an ATAR and supports the development of an ATAR that meets the needs of the tertiary sector without imposing unintended consequences on schools. QCEC recommends that in line with the government draft response, priority work ensue in consultation with stakeholders to develop transparent methodology for calculation of an ATAR.
- 1.4. QCEC has supported the separation of responsibilities so that QCAA is responsible for certification and universities take responsibility for tertiary entrance decisions; QCEC also acknowledges the strong demand from the tertiary institutions in Queensland to have an ATAR like other states, despite the inconsistency that exists in its calculation across states. However, QCEC reemphasises that the calculation of an ATAR cannot be effected in isolation. Decisions about ATAR calculation will inevitably impact on schools just as decisions about subject assessment results in schools will impact on tertiary entrance: the process for calculation of an ATAR needs to be transparent so that impact on student learning is clear; and the process should not have a negative backwash effect on curriculum taught in schools.
- 1.5. QCEC highlights again the need for proper resourcing to all stakeholders, including Queensland Curriculum and Assessment Authority (QCAA), schooling authorities and teachers to support any transition that heralds very significant change for senior schooling and tertiary entrance. QCEC supports a managed transition away from the OP system but reiterates the need for proper resourcing to enable an effective transition. The larger question of exactly what is to be transitioned to must be resolved in a manner that brings best outcomes for students in schools and in tertiary institutes.
- 1.6. QCEC reiterates its fundamental principle that equity, fairness and appropriate discernment in providing access to post school pathways serves not just the individual's needs but the common good in supporting productivity, social justice and just and sustainable use of higher education resources. In focusing only on the production of an ATAR for university entrance purposes and not facilitating alternative pathways for students post-school, the review recommendations have failed to provide for equity in response to individual student needs or for the common good in discerning suitable pathways for the majority of students.

Q2. Would you support discontinuation of the QCS Test?

- 2.1 QCEC generally endorsed the proposal that scaling processes should no longer apply; QCEC was not supportive of increasing the amount of assessment students undertook and with an element of external assessment in each subject proffered, QCEC supported the removal of the QCS Test in order to avoid another third tier of assessment.
- 2.2 The removal of QCS Test and the accompanying complex scaling opens the opportunity for greater transparency and understanding of what has become a decreasingly understood system of OP calculation. The limitation of the QCS Test was not in the test itself but in the complex scaling calculations to which the test scores were applied.

⁷ It is noted with interest here that recent QCAA awards to very high achieving Year 12, 2014, recognised students with high OP (1) who had substantial additional achievements in 7, 8 or 9 senior subjects, university subjects and VET qualifications.

- 2.3 In supporting the discontinuation of the QCS Test, QCEC is very cognisant of the need for an equitable mechanism for determining the comparative value of results in different subjects for tertiary entrance purposes⁸. QCEC is adamant that this mechanism must be transparent and easily understood. Replacing one complex system with an equally complex and opaque system of assessment and tertiary entrance will achieve nothing.
- 2.4 QCEC notes the Common Curriculum Elements (identified by matrix currently in various subject syllabuses) and the use of these elements in the Core Skills Test. Whilst not supporting the continuation of the QCS Test, QCEC would be keen to ensure that such key elements (or capabilities) are retained in senior subject assessment.

Q3. Would you support an ATAR being based on the results of four rather than five senior subjects, if this approach was found to be technically feasible?

- 3.1 The issue of an ATAR and its calculation requires very significant technical work, modelling and consultation. It could be quite viable to use four subjects⁹ for calculation of an appropriately robust ATAR but a broad general education is unlikely to be represented in four subjects, only being undertaken at school¹⁰. From an educational point, school curriculum arrangements would have to provide beyond this minimum requirement in the number of subjects studied for an ATAR if potential backwash effects on schools and broad education were to be avoided. Re-casting subject syllabuses to take up more time when fewer subjects are required is not the solution if an education purpose beyond tertiary entrance is sought.
- 3.2 QCEC notes the potential pressure on schools, torn between providing the best overall education opportunities for their students and capitalising on minimum subject requirements for an ATAR to provide best tertiary entrance opportunity.
- 3.3 QCEC notes that the original Terms of Reference for the Queensland review of senior assessment and tertiary entrance indicated that the scope of the review would not include revision of the Queensland Certificate of Education (QCE). While the QCE requirement for 20 semester units of study may have been taken to ensure some breadth of school subject coverage, more recent discussions about the potential need to review QCE requirements in light of current review recommendations do call into question again the scope of curriculum in schools.
- 3.4 QCEC notes a particular issue for Catholic education, where the study of some form of religion is a requirement of students in Catholic schools. That study may be part of the current requirements for tertiary entrance as the Authority subject or may be over and above those requirements where the Authority subject Study of Religion is not the option undertaken. Curriculum opportunities could be narrowed further for students in Catholic schools if four subject ATAR regime backwashed into school offerings.

⁸ QCEC acknowledges that universities could eliminate this issue by identifying the appropriate and necessary pre-requisite subjects required for entry into any specific course. The counter issue so caused is that students can then be locked into a course of study by dint of the pre-requisite subjects studied at school with no opportunity to choose other courses thereafter. Of course, this does not address the universities' demand for one single rank order provided by an ATAR.

⁹ QCEC notes that ATAR calculations in other states work on various combinations of four subjects in essence.

¹⁰ QCEC notes recent QCAA awards to high achieving Year 12, 2014 students, all of whom had studies in school that far exceeded the required 5 Authority subjects required for an OP. This recognition highlights the possible breadth and depth of school education that should not be impinged upon by tertiary entrance process backwash.

- 3.5 In line with its stated principle that learning should foster the holistic formation and well-being of the individual student and not be unnecessarily circumscribed by assessment requirements, QCEC is concerned to ensure that appropriate limits on ATAR requirements do not translate into restrictions on curriculum in schools.

Q4. Do you support the use of four assessment activities for each senior subject, rather than the current arrangements which typically require students to complete between four and six assessments?

- 4.1. QCEC supports limiting the number of assessment items undertaken by students although it is noted that a number of issues emanating from the review recommendations and draft government response, while quite supportable when considered separately, have potential for significant impact if considered together and at their extremes. QCEC raises concern at the potential for unintended consequences when arrangements for limiting assessment, front ending quality assurance, pre-determining type and timing of school assessment and using external assessment in each subject are considered as part of the whole system.
- 4.2. There is some caution that requirements for front end quality control of assessment items and limitations on school based assessment (while supported) could result in much more standardised forms of assessment and the loss of innovative contextualised assessments by schools. QCEC notes the delicate balance between retaining and building on the existing professionalism of Queensland teachers and introducing structures which could impinge on that professional expertise.
- 4.3 QCEC is uncertain about how assessment will occur under the proposed regime and how schools would form their learning program. Questions are being raised as to:
- whether schools will form their individual work programs
 - whether standardisation will be such that schools work directly from a syllabus that pre-identifies the type and timing of all school assessment and
 - the type and timing of external assessment as well
- QCEC is seeking greater clarity on these issues and would welcome further discussion to resolve in appropriate forums with QCAA and education stakeholders. It is not helpful to promulgate a unilateral position without such consultation. QCEC recognises that the veracity of some review recommendations can only be established by trialling in practice and is supportive of the work being progressed through the QCAA established Senior Curriculum and Assessment Working Group and the Measurement Working Group.
- 4.4 QCEC has no desire to see students put under pressure by unnecessary or excess assessment but at the same time recognises that the fewer assessments undertaken, the greater the stakes with each assessment and the greater the pressure for students. Limited, meaningful, quality assessment is desirable. QCEC notes that under current proposals as interpreted by the government draft response, 50% of an overall subject result (that is, half of the result from the four pieces of assessment) comes from an external assessment item. QCEC is yet to be convinced that this will form the best assessment regime for all subjects.
- 4.5 Pointing back to the principle that teaching, assessment and tertiary entrance processes should recognise the different needs of students and be equitable in providing access and pathways appropriate to needs of different students QCEC again raises the issue that the review recommendations and government draft response have focused only on tertiary entrance and the implications for other pathways undertaken by 60% of Year 12 leavers

remain unexplored and unaddressed. QCEC urges the government to give due consideration to the learning and assessment needs of all senior secondary students in Queensland schools.

Q5. Do you support the inclusion of one external assessment which would generally contribute 50 per cent of the overall subject result?

- 5.1 QCEC has expressed in-principle support for some element of external assessment in those subjects where that is shown to be a viable and reliable indicator of student learning. QCEC does not support the blanket use of 50% external assessment across all subject areas without extensive consideration of how this form of assessment contributes to appropriate recognition of learning in each subject¹¹.
- 5.2 QCEC supports the ACER recommendation that expert subject groups contribute to the discussion of the appropriate amount and type of external assessment for each subject. QCEC is simultaneously, cautious about the unintended consequences of having different amounts of external assessment in different subject or of some subjects having external assessment while others do not. There is a delicate balance to be maintained between the prevailing support for school based assessment as integral to quality teaching and learning in Queensland and acceptance that an element of external assessment could enhance overall assessment outcomes. This balance extends to the need to ensure that external assessment does not become prioritised or valued over and above school assessment but is recognised as an adjunct to it.
- 5.3 A central concern of QCEC is with the use of the external assessment in relation to school based assessment and calculation of ATARs. QCEC is opposed to any rescaling of school assessments according to external assessment results. Thus, QCEC is very supportive of the ACER argument against scaling school assessment results to the results of external assessment. As a consequence QCEC is very concerned at the government's draft response, influenced by the Education and Innovation Committee Report¹², to indicate this recommendation against scaling should be subject to further feasibility assessment. QCEC rejects the use of such scaling.
- 5.4 QCEC notes here a fundamental diversion between the priorities of the schooling sector, conditioned and supportive of use criteria based assessment where the focus is on what each student can do, and the priority of tertiary institutions for a norm referenced ATAR score which will rank each student not in order of what they can do but according to their relative position in a body of students who might be qualified to seek tertiary entrance.
- 5.5 Any move toward normative rather than standards referenced assessment would not be supported. This includes any form of scaling in processes related to the calculation of a subject result. Such scaling could have significant implications for the distribution of final grades and raises the possibility that students will not receive recognition in their subject

¹¹ QCEC notes that Western Australia has an element of external assessment in practical subjects. For HPE it is understood that this involves bringing together HPE students to demonstrate their practical skills in a central assessment – very expensive where Equestrian students also bring their horses. While the assessment activity is no doubt highly appropriate to the practical nature of the subject, it would be difficult to legitimate the expense and outcome for Queensland to undertake a similar external assessment in practical skill areas. This assessment can be done effectively at school level.

¹² QCEC made a brief appearance at the Parliamentary Enquiry into Assessment methods used in senior mathematics, chemistry and physics in Queensland but considered the impending review of senior assessment to be the priority area of engagement. The independently contracted ACER Review is fuller and more representative of the views of QCEC than the previous limited frame enquiry.

achievement results for the knowledge, understanding and skills that they have been able to demonstrate.

- 5.6 QCEC notes the ACER recommendation to scale marks in the External Assessment “to ensure the full range of marks is used” (ACER, 2014, p 62). This process is not well developed or articulated in the review report and is open to multiple interpretations. QCEC believes that both the rationale and methodology to determine a subject result needs to be more clearly articulated. A student’s end result must be (and be able to be seen as) valid, reliable and meaningful.

Q6. Do you support more specific requirements for school-based assessments, with a common format and common conditions, and prior endorsement by QCAA?

- 6.1 QCEC supports the notion of front end quality assuring assessment items to be used in schools and recommends that this be done in a manner that builds on and values the professionalism of teachers.
- 6.2 In its initial response to the review QCEC highlighted its very strong support for school based assessment. In supporting the proposals for some quality control around school assessment with specific requirements and common format and conditions for school assessment, QCEC observes that the very strength of school assessment can be undermined by processes that put more and more rigid and standardised requirements around it. School based assessment could be reduced to standard off-the-shelf assessment that is simply administered and marked at the school level if this recommendation is enacted to the extremes. None-the-less, QCEC is supportive of some common requirements for school based assessment provided these remain general and do not become restrictive and overbearing. This will be a very fine line to tread and will require collaborative consultation and development with teachers.
- 6.3 QCEC believes it is important to retain the integrity of those subjects with a high practical component in any assessment regime. It is important that the nature and content of these subjects should not be altered by any external element of assessment. QCEC is very supportive of the use of cross-sectoral expert subject groups in informing deliberations on appropriate amounts and forms of external assessment in individual subjects, most especially in subjects with a high practical element.

Q7. Do you support the development and trialling of new quality assurance processes for school based assessment?

- 7.1 QCEC supports collaborative development and trialling of appropriate quality assurance processes for school based assessment. This is not a blank space that has to be filled and QCEC supports the government’s draft response proposal to strengthen the effectiveness of the existing panel moderation process in the interim before other measure are re-introduced¹³.
- 7.2 It is not yet clear how the proposed quality assurance processes will impact on the work of teachers in school. Ideally, support would be available to work with teachers as required to assist in the collaborative development of assessment items and marking schemes; this would provide professional development for teachers as well as help ensure quality. In reality, there

¹³ QCEC observes that the proposed introduction of “dedicated assessment advisors with specific subject expertise” has been enacted and successful in a previous era of senior assessment in Queensland.

may be such pressure on the work of the experts over confined periods of time (e.g. planning time at the beginning of the school year), that rather than a collaborative and supportive role, this may turn into a compliance activity to get assessment items “signed off”. The more difficult and constrained the compliance regime becomes, the greater the pressure will be to adopt standard assessment items (those that have been previously approved for that school, elsewhere or perhaps even “banked”).

Q8. Do you think that a 60-point subject result would provide an adequate representation of student achievement?

- 8.1. QCEC believes the key driver in the design of a subject result and the assessment processes that underpin it must be to produce an outcome that is reliable, valid and provides unambiguous information to students, parents and teachers about the student’s achievement in the subject.
- 8.2. QCEC is concerned that the processes for determining a subject result described in the ACER report: *Redesigning the secondary-tertiary interface* and referred to in the Draft Queensland Government response provide insufficient detail in the current form for QCEC to be able to provide informed support.
- 8.3. Whilst QCEC acknowledges the merit in a relatively simple and transparent process of each student’s Subject Result calculated as the simple sum of the student’s marks on the four assessment activities and reported on a scale of 1 to 60 there is a need for greater detail around the process of arriving at numerical results for each assessment piece.
- 8.4. QCEC is concerned that focus in the Draft Queensland Government response has shifted too much to the production of an ATAR and there is a risk that the primary focus of ensuring the subject result provides meaning information to the student about their achievement may be compromised.
- 8.5. QCEC therefore supports the proposal that a senior assessment taskforce led by QCAA oversee the modelling, development and testing of subject result reporting options.

Q9. Do you think that introducing new senior assessment and tertiary entrance systems in 2017 for students entering Year 11 would provide sufficient time for students, families and schools to prepare?

- 9.1. The lack of detail around key elements of the proposal ensures that judgements about the implementation timelines at this stage are at best guesses and not based on a clear understanding of what milestones need to be achieved to ensure a successful implementation.
- 9.2. Decisions around implementation timelines need to acknowledge that the readiness of all stakeholders must be adequate for new systems to be developed and implemented. These stakeholders include students and families, but should also include systems, schools and teachers.
- 9.3. A successful implementation will require timeframes that allow for adequate trials of various components, for the trials to be properly evaluated and to allow further stakeholder engagement that will meaningfully inform final implementation.
- 9.4. Timeframes must also allow for comprehensive education for students and their parents and quality professional learning for teachers and school role holders.

- 9.5. The recommendations outlined in the Draft Queensland Government response have broad implications across schools, student subject selection, syllabus development, assessment practices, certification, tertiary entrance and IT systems.
- 9.6. Given these considerations QCEC believes that an implementation of new senior assessment and tertiary entrance systems in 2017 is not feasible.

Conclusion

In responding to the questions posed via the government survey and the draft government response to the ACER review, QCEC tried to keep in mind the principles of holistic formation and well-being of students, equity and recognition of the needs of different students and the common and individual good in discerning appropriate access to post school pathways. There is a concern that both the ACER report and the Draft Queensland Government response have failed to address key aspects of the senior assessment and tertiary entrance processes. As a result of these shortfalls, QCEC has highlighted a number of specific issues. The absence of any recognition of those students not on a tertiary entrance pathway or not undertaking a traditional academic course is of great concern to QCEC, as is the pre-eminence of determining an ATAR in accordance with university demands. There are significant risks of backwash to narrow school curricula. There is no thought to the impact on the Queensland Certificate of Education (QCE) (other than possible change) or whether this remains a viable certification.

On the other hand the review and the government response provide welcome opportunities to strengthen and build on school based assessment processes and to retain the professional input of teachers. There are unresolved issues about how subject achievement results are calculated and reported but opportunities for engaging professional conversations with stakeholders and the reviewer to elaborate. What cannot be allowed to happen is that these conversations become privileged so that only an inner few understand the workings of a results system.

There are many more consultations to happen from this review. QCEC thanks the Queensland government for the opportunity to provide feedback and looks forward to continued ongoing engagement and consultation to fill the existing shortfalls.