



Response to the feasibility of publishing student with disability (SWD) data on *My School*

30 June 2016

BACKGROUND

The Queensland Catholic Education Commission (QCEC) submits this response on the feasibility of publishing on the *My School* website, Students with Disability (SWD) data collected through the Nationally Consistent Collection of Data (NCCD) on behalf of Catholic school authorities in Queensland.

QCEC is the peak strategic body with state-wide responsibilities for Catholic schooling in Queensland. There are 300 Catholic schools in Queensland, administered by five diocesan school authorities (Cairns, Townsville, Rockhampton, Brisbane and Toowoomba) and 17 Religious Institutes and other incorporated bodies.

Catholic schools in Queensland educate a total of 146 496 students including 5 791 students with disabilities as identified under current state definitions. The 2015 NCCD count included 18 332 students.

This response has been informed by feedback from the five diocesan school authorities and six Religious Institutes and incorporated bodies and has been structured as per the online feedback questions two to fifteen (2 – 15). Details as required in Question 1 are incorporated above.

SECTION 1: Reporting on Students with Disability Data on *My School*

2. What is your initial reaction to the proposal to include SWD data on *My School*?

The majority of Catholic school authorities do not support the proposal to include Student with Disability data on the *My School* website at this point in time and although some identified support in principle for such publication eventually, a number of concerns and issues have been identified as barriers.

Catholic school authorities are in agreement that the SWD data collected through NCCD processes should not be published until such time as consistency is achieved in the interpretation of students to be included or excluded and in the assignment of adjustments levels. The current data is considered too inconsistent and unreliable to publish. Whilst the ultimate aim would be to gather valid, reliable and consistent data it is far too soon to consider publishing the data as it is currently too subjective in

interpretation of students to include and levels to be assigned. While QCEC has undertaken activities across Catholic school authorities to engage in moderation and increase consistency of data (and other Queensland school sectors have done likewise) it is recognised that teachers are still in the early stages of applying a new and different set of criteria for counting students with disability. Discussions across the state and at national level would indicate that the NCCD data could not yet be considered as robust.

Inclusion of SWD data on the *My School* website could be positive if the data was transparent, reliable and valid and greater confidence in the consistency and accuracy of the data was achieved. The inclusion of the SWD data on the website could help to build a clearer picture of the school and the context in which it operates. The publication of unsubstantiated data will put at risk the positive outcomes that might be otherwise possible.

A significant communication strategy will be essential to support any publication of NCCD on the *My School* website. It would be useful to provide an overview of how the data is collected (e.g. broad definitions of the Disability Discrimination Act (DDA), teacher judgement, and adjustment categories). Historically the term 'SWD' in Queensland has referred to verified students with disability while the proposed data for inclusion on *My School* is based on NCCD. There is a significant difference in the data that is being captured through NCCD and what schools, families and communities identify as a student with disability currently.

It is not immediately clear how the inclusion of NCCD data would be helpful to parents. The data is about individual students and the support and adjustments they need to participate in education on the same basis as students without disability. The grossed SWD data will indicate to parents how many students are being supported in the school but read without background information or understanding of the needs of the students or the NCCD process, could be unproductive and unhelpful.

3. Which of the following principles should the proposal to add SWD data to *My School* satisfy? (Highlight as many as apply)

Catholic school authorities agreed that all principles (transparency, fairness, accountability, comparability, data quality, reliability and validity) needed to be satisfied for inclusion of SWD data on *My School*.

Others principles that could be considered for inclusion are consistency, readability, confidentiality.

4. Please explain the reason for your selections in question 3

Catholic School Authorities believe that at this point in the data collection it would be difficult to satisfy all principles because of lack of consistency and accuracy of the data and the resultant compromise to data quality. The data collection needs to be objective, valid, reliable and consistent regardless of the school or state context in which it is gathered. Currently the data risks being too subjective. Concerns with confidentiality in terms of non-identification of individual students need to be resolved.

5. What SWD data would you like to see included in *My School*?

Overall response from Catholic School Authorities was 'NONE'.

The overwhelming response from Catholic School Authorities was that until consistency of the data collection is achieved throughout Australia, SWD data based on the NCCD should not be included. If the decision is made to have the SWD data included, then it should only be represented as a percentage of the total enrolment as per the Indigenous and Language background other than English data and disclaimers around the validity of the data will need to be clearly included.

6. What concerns do you have about publishing SWD data on *My School*? (Highlight as many as apply)

Student privacy, data quality, fairness, school comparability and transparency were all highlighted by Catholic School Authorities as concerns relating to the publishing of SWD data on *My School*. Other concerns identified were reliability and validity.

Please explain your response:

Student privacy - Maintaining confidentiality of students in smaller schools and communities is a source of concern. Student privacy is not a major consideration if data reported at whole school level is as a proportion of total enrolment.

Comparability of data - Different professional learning materials and processes have been used across school sectors, jurisdictions and states with inevitable influence on the consistency of the data. Again, it is reinforced that the current data quality is not robust or consistent across all jurisdictions.

Parental and general public misunderstanding – Concerns were raised about building understanding of how students are identified for inclusion in the SWD data on *My School*. The NCCD process is based on teacher judgement and uses levels of adjustments and the broad categories under the DDA which captures a completely different data set than previous experiences of eligibility based on the Queensland criteria for inclusion. Family expectations about resourcing for students captured in the NCCD process may have implications for resourcing distribution in schools.

Enrolment impacts – it is noted that without adequate understanding of data some parents may be deterred from enrolling in one school due to the perception about SWD numbers, or equally that the school may attract more SWD enrolments as a result of perceived high numbers of SWD. This can be difficult to manage given varying degrees of teacher experience and available support in schools particularly in more remote settings.

There is no clear statement of the intent for provision and use of the data. Including SWD numbers does not give an indication of the quality of educational program.

SECTION 2: ACARA prepared several options illustrating how the students with disability data might be presented on *My School* in the context of a new Student Background page.

OPTION 1: This option simply depicts the total number of students with a disability enrolled at the school. This could be displayed as a percentage as well. *Any number of percentage based on less than 5 students would be suppressed for privacy reasons.*

7. Should *My School* present the SWD enrolment count as the actual number of students or as the percentage of total student enrolment?

While reiterating the strongly held view that publication of data should be delayed until it is considered robust, Catholic School Authorities overwhelmingly preferred that the SWD enrolment count be provided as a percentage of total school enrolment so as to be consistent with Indigenous and Language background other than English reporting.

OPTION 2: A more detailed option with information showing a table containing the level of adjustment by disability category and the percentages of students with disability at the school. Any percentage that compromises student confidentiality would NOT be shown. Therefore the example is most appropriate for large schools (e.g. greater than 500 students)

8. How useful would it be to include the table of level of adjustment by disability category (even if some cells may not be shown because they are based on too few students)?

Overall response from Catholic school authorities was 'NOT VERY USEFUL AT ALL'.

Why?

In order to include this information there would need to be considerable community education regarding the definition, categories and adjustment levels. As indicated previously, it is important that there is a clear understanding of the SWD data that is captured through NCCD as it is a significantly different data set than previous experiences. The level of adjustment does not guarantee or provide information about a student's actual performance.

Enrolment patterns in schools could be impacted by publication of SWD data, between those parents that do or do not want large numbers of SWD enrolments in the school or class for their child.

If ACARA breaks down the data into the categories, thus including more than a general overall percentage, children with particular and very low incidence disabilities could be easily identified even if they attended larger schools. Confidentiality is a concern.

OPTION 3: This option show two charts with the percentages of students in each disability category and in each classification of the level of adjustment against both the national percentage and those for the schools of similar school type (e.g. primary/secondary/ combined/special). The charts enable the user to see how the current school compares with other schools.

9. Do you think it would be useful to see a comparison of the selected school's proportions by disability category with national and similar schools? Select from:

Overall response from Catholic school authorities was 'NOT VERY USEFUL AT ALL'.

Why?

Catholic School Authorities responded that there should be consistency of information across all data sets. Therefore, if the information is to be provided it should be provided as it is for Indigenous and Language background other than English, as a percentage of total enrolment.

The percentages in the table are very confusing and would be difficult to interpret by the vast majority of Australians particularly if they do not have a clear understanding of the NCCD process and that it is subject to teacher judgement.

10. Do you think it would be useful to see a comparison of the selected school's proportions by level of adjustment with national and similar schools?

Overall response from Catholic school authorities was 'NOT VERY USEFUL AT ALL'

Why?

Rather than comparing the school with national and similar school data, it would be more useful to merely publish the national data in terms of disability category and level of adjustment.

11. Can you foresee any problems in comparing these proportions with national proportions and similar schools?

The identification of similar schools is often questioned. It would be better to provide the information on the school and the national data comparison. Similar school comparisons are not always considered helpful, especially in relation to those with significant cohorts of students with diverse needs. Interpretation and use of data is a general concern if used for comparing schools.

As previously stated, in order to interpret the data it is important that there is a clear understanding of how the data has been collected through the NCCD process and that the numbers captured are based on different criteria to one parents may be more familiar with, that is students who meet the Queensland criteria used by all three sectors.

Questions may arise if only SWD data and no other data sets, like Indigenous and Language background other than English, are being compared against national and similar school data. Consistency would be to provide the comparisons for all data sets or none at all.

12. Which of the options for presenting the data do you prefer?

Option one is the preference for Catholic School Authorities.

Please explain the reasons for your selection

Please refer to comments provided in questions 8 through to 11 which reflect the preference for option one.

13. Do you have any other suggestions as to how SWD data might be presented on *My School*?

The preference for presenting SWD data (once robust) as a percentage was the strongest and would be in line with the data provided for Indigenous and Language background other than English.

14. Do you have any other general comments about the inclusion of SWD data on *My School*?

The rationale for the publication of SWD data on the *My School* website is questioned by Catholic School Authorities. Data is collected to provide information that is then analysed to create knowledge and ultimately wisdom to better support students.

The purpose provided in the consultation pack states that ‘making data about schooling publically available, including SWD data, will help ensure that every Australian child received the highest quality education.’ QCEC questions the implied causal link between publication of data and quality educational outcomes.

As with all data about inclusive practices, it is important that these numbers are promoted positively in terms of appropriate identification and response to student need.

The publication of data does not reflect the work that is going on behind the scenes – in the everyday classroom adjustments, modifications etc., and does not acknowledge the differences between levels of schooling (primary, secondary, middle, senior) and what can or cannot be provided. It is not at all evident how publication of this SWD data will show that every Australian child has received high quality education.

Data quality and comparability remain a significant concern and Catholic School Authorities would strongly recommend that if SWD was reported on the *My School* website it be in a similar form as per Indigenous and Language background other than English data.

There is still too much inconsistency with the NCCD data and therefore it cannot be considered as ‘fair, reliable, valid and comparable across schools’. This fails to meet the conditions and principles of the *My School* website as stated in the Student with Disability consultation pack (point 1.3).

It has the potential to result in schools being labelled as only working with certain disability categories.

15. Can we contact you to discuss your comments? If so, please provide your contact details.

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