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## **NSW SECONDARY PRINCIPALS' COUNCIL POSITION PAPER ON SCHOOL ACCOUNTABILITY, DEVELOPMENT AND REPORTING IN NSW PUBLIC SCHOOLS**

ADOPTED BY STATE ASSEMBLY 3 SEPTEMBER 2009

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This position paper:

- states the Council's policy in relation to the accountability of schools and the ways that this interacts with school development and planning on the one hand and the obligations of reporting to the community and government on the other;
- states the Council's policy in relation to the accountability of the government and the DET in relation to its schools and their communities; and
- replaces the current position papers in those policy areas

This is one of two related position papers in the area of principal and school authority and accountability. The other related paper is *"The role, authority, leadership and accountability of the principal"*, to be developed in late 2009 and 2010, which will update and replace the *"The Leadership of Secondary Education in NSW Public Schools"*, adopted and published as an interim statement by Council in 2004.

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## 1. Accountability

“Accountability” is an ethical concept that embodies several elements, beginning with an acknowledgment and assumption of responsibility for actions, decisions, outcomes and policies within the scope of a particular role or position. It is a critical practice in good governance where it encompasses the obligation to report, explain and be answerable for results and consequences. As a result, accountability carries the potential for improvement as well as an implied threat of sanction or punishment in the event of failure; although the latter is sometimes ignored, or obfuscated by rhetoric.

The degree of *accountability* that an individual can have or assume must, of necessity, be moderated by the degree of *authority* which they are able to exercise in making and implementing critically important strategic and tactical decisions within their area of responsibility. While they may report on outcomes, it does not follow that they should be *accountable* for them unless they possess sufficient command authority or resources to influence the outcomes effectively. These matters are the subject of a separate paper.

Over recent decades both in Australia and internationally, considerable attention has been directed to accountability in education, coupled with a great deal of political rhetoric around the real or perceived shortcomings of schooling. Much of this attention has focussed on the role, authority and accountability of the principal. In NSW, this has led to a number of important developments, including expanded professional learning for school leaders and increased emphasis on the public reporting of school performance. In all of these developments, the NSW Secondary Principals’ Council (NSWSPC) has played a strong leadership and advocacy role on behalf of its members, schools and public education generally.

The NSWSPC considers it an essential element of the principal’s role to have ethically appropriate systems and processes in place to assess, report upon and account for their own performance and that of their schools, both to their school community and to system authorities.

Similarly, the NSWSPC believes that all those working in education, from classroom teachers to the Director-General and Minister, should be accountable in a transparent way for their practices and performance within the context of the state’s overall operation. In acknowledging this two-way nature of accountability, NSWSPC asserts that it is reasonable to expect that the DET bureaucracy and government should:

- regard themselves as accountable to schools and the community for the resources, support services and leadership they provide;
- engage consultatively with the expertise and specialised knowledge of the professional educators who lead and work within their schools; and
- recognise, at both federal and state levels, their particular accountability in relation to public education.

The NSWSPC will continue to give professional, considered and fearless advice to government and bureaucrats in matters that arise from and affect school, principal, bureaucracy and government accountability and governance. In particular, the NSWSPC will continue to advise governments of the risks to high quality education in NSW from simplistic, short term intrusions by government and media into educational decision making.

## 2. Background to this Paper

The NSWSPC is committed to providing all students in NSW public schools with education of the highest possible quality. On national and international comparisons over many years, school students in Australia – and those in NSW in particular – have performed at levels comparable with the best in the world. The chair of the National Curriculum Board – a person who is well qualified to make such a judgement – has stated that “there is no quality crisis in education, notwithstanding the way in which crises are often manufactured to create or support political debate in Australia”.<sup>1</sup>

The community shares a responsibility to build on our strong base with every new cohort of students and to ensure that they all enjoy an equal chance of success. An important element of accountability is an appropriate dialogue about the full range of data - about needs, resources, methodologies, administration, performance and outcomes.

In recent years accountability mechanisms for school, staff and principal performance have become increasingly complex and unidirectional as additional requirements have been mandated by governments and their agencies at all levels.

Significantly, it has become clear that testing and accountability mechanisms are currently seen by governments as the “magic bullet” that will remove what they perceive as barriers to further improvement in the performance of our schools. Whatever merits this line of argument may have, there is a very real possibility that the sophisticated understandings about student and school performance, essential to sustained improvement, will be swallowed up by simplistic measures, side issues and by the ill-informed posturing of a range of interest groups.

For some years, the readiness of politicians to create crises, espouse causes and import solutions – including ill-conceived reporting and accountability measures – against professional advice, research evidence and world-wide experience is creating major difficulties in the administration of education in this country. It is against such background that this paper has been developed.

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<sup>1</sup> Barry McGaw; “*Australian Schools – Three questions; three answers*”; Professional Educator, Vol 8 No 2; June 2009

### 3. The Contexts of Accountability

#### 3.1. The International Context

As a sovereign nation, Australia is accountable only to its own people for the quality of its education provision. Nevertheless, an international perspective is useful, since it can highlight features – both positive and negative – that might otherwise be difficult to discern by only looking inward. The problem that arises when we try to look at Australian education in a world perspective is the fact that there is limited common ground of organisation, curriculum and testing to use as a basis for comparison.

This is a particularly difficult problem, since few countries are closely comparable with Australia in terms of such educationally important dimensions as curriculum and credentialing, social/ethnic diversity, isolation, indigenous education, fragmented governmental responsibility, the national and local mix of schools, administration of schooling and so on.

One important context for framing ourselves as a nation is the Organisation for Economic Co-operation and Development (OECD). The OECD is structured as a setting in which governments can *compare policy experiences, seek answers to common problems, identify good practice and coordinate domestic and international policies*<sup>2</sup>.

The OECD maintains a program of statistical collections and reporting in a range of policy domains, including education. It sponsors international surveys that are of interest to educators, most notably the *Program for International Student Achievement (PISA)*<sup>3</sup> and more recently a *Teaching and Learning International Survey (TALIS)*<sup>4</sup>. These provide a solid basis for judging Australian education in a broad international perspective

Another long-established international study is the *Trends in International Mathematics and Science Study (TIMSS)*, conducted by the International Association for the Evaluation of Educational Achievement (IEA). It collects educational achievement data at Year 4 and Year 8 to provide information about trends in Mathematics and Science performance over time from more than 60 countries.<sup>5</sup>

In these international comparisons Australian (and NSW) education continues to be amongst the best in the world, a position that Australians should expect to be maintained (see Section 4).

So how is Australia's education system performing?

##### 3.1.1. Expenditure on Education

One primary international comparison is the expenditure on education, either as a proportion of GDP or against other measures. Historically, Australia does not fare particularly well in this kind of comparison, spending less of our GDP on education than the countries with which we tend to compare ourselves. Within that total picture, public schools fare even worse: public school students in Australia receive a per capita resource that is about half of the equivalent expenditure in the UK

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<sup>2</sup> [http://www.oecd.org/pages/0,3417,en\\_36734052\\_36734103\\_1\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/pages/0,3417,en_36734052_36734103_1_1_1_1_1,00.html)

<sup>3</sup> [http://www.pisa.oecd.org/pages/0,2987,en\\_32252351\\_32235731\\_1\\_1\\_1\\_1\\_1,00.html](http://www.pisa.oecd.org/pages/0,2987,en_32252351_32235731_1_1_1_1_1,00.html)

<sup>4</sup> [http://www.oecd.org/document/0/0,3343,en\\_2649\\_39263231\\_38052160\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/0/0,3343,en_2649_39263231_38052160_1_1_1_1,00.html)

<sup>5</sup> <http://timssandpirls.bc.edu/>

and USA. We spend approximately the same on each private school student from public funds as is spent in the USA and UK on public school students.<sup>6</sup>

This has obvious implications for governmental accountability and NSWSPC welcomes the federal government's recently increased expenditure on schools which, in some respects at least, moves closer towards some reality and equity to education funding. We hope that the forthcoming funding review consolidates and builds upon these initiatives.

### *3.1.2. Pisa Testing*

A second major international comparison is the OECD's Program for International Student Achievement (PISA) – a testing program that provides information on student performance that can be compared across OECD nations. Notwithstanding the limitations of resourcing, Australia has been ranked in the top10 since 2000 and, despite a slight drop in recent years, is one of the countries watched by other nations for the high quality of its education system.

However, in examining the PISA data, it is clear that Australia does have some challenges in:

- ensuring that students at the top of the performance range continue to do well;
- addressing the inequity evident in the gap between the top- and the bottom-performing students;
- mitigating the differences in student performance between schools that are caused by our system of funding and support; and
- increasing Year 12 completion rates to acceptable levels.<sup>7</sup>

An important point to note about the PISA data is that it was obtained by a sampling process, not by testing every student in every country. Sampling is a credible, effective and efficient way to identify trends and to highlight challenges such as those listed. Testing every school student would have been far more disruptive, far more costly and would have produced no further insights.

## **3.2. The National Context**

Education in Australia is a state responsibility, but the past few decades have seen an inexorable shift in the real political locus of education. By way of grant mechanisms, successive federal governments have assumed an increasing role in funding schools - especially private schools - with profound policy and educational implications. Initially under the Coalition and continuing under Labour, federal governments have used their financial leverage and, more recently, an unprecedented state and federal political alignment, to intervene directly in the education policies and practices of the states.

### *3.2.1. Education funding in Australia*

This is a deeply complex matter and not the subject of the present paper; however Australia's idiosyncratic approach to funding schools is inseparable from many of the issues facing education, including school development and accountability, especially when they have been explicitly linked by government strategy.

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<sup>6</sup> Adam Rorris & Jim McMorow – information presented at National Public Education Forum, ACT 2009

<sup>7</sup> McGaw, Barry; "Australia's Schools – Three Questions, three Answers"; Professional Educator, Vol 8 No 2; June, 2009

While the total of school funding in Australia is relatively small by international comparisons, the previous federal government implemented a program of directly favouring private schools. Since the change of government in 2007, increased amounts of federal money have been directed into all schools under the Rudd government's "Education Revolution" banner. Simultaneously, the Council of Australian Governments (COAG) has been asked to approve a range of measures, including such long-standing political icons as national curriculum and school accountability.

### 3.2.2. National testing and reporting

In October 2008 a new statutory body, the Australian Curriculum and Reporting Authority (ACARA), was established by the federal government to implement "a new era of transparency and quality in Australian schools".<sup>8</sup>

One of ACARA's core responsibilities is to put in place a national framework of data collection and reporting about the performance of schools. Responsibility for existing data collections, such as NAPLAN, has also been assigned to ACARA, so that a comprehensive body of educational statistics will soon be centralised under one authority. The data is to be made publicly available on an ACARA-maintained website<sup>9</sup>.

A feature of the federal government's approach to the reporting of school data – echoed by the states – has been an insistence that they would not construct "simplistic league tables" and they have assured schools that (so far unspecified) strategies will be put in place to ensure that third parties, such as media organisations, will not do so either. Notwithstanding this stated intent, simplistic tables of school data have already been published and so far only one Parliament (NSW) has taken any legislative steps to prevent such publications.

In its submission to DEEWR on protocols for the reporting of school data, the Australian Secondary Principals' Association (ASPA) stated its support for transparency and accountability and argued that schools currently collect and report a sufficient breadth and depth of data to meet the diverse needs of parents, teachers, administrators and governments. ASPA also agreed that, while the public was generally very well served already with context-linked information about its schools, a national perspective would have merit.

Nevertheless, ASPA strongly expressed the concern of principals that, notwithstanding the protocols surrounding its use, the public availability of such data would have similar negative consequences to those seen in many other countries. In particular, such a comprehensive database as is proposed would be open to exploitation in ways which would hinder, rather than progress the cause of education.

### 3.3. The New South Wales context

NSW public schools have long-established practices in which they undertake a rigorous process of evaluation, reporting and accountability on an annual basis, to demonstrate to the community the quality of their education and to provide in-depth information about the school's programs and performance. The NSWSPC has taken a role in the development of these practices in a chain of initiatives and consultations dating back through the 1990s. In response to community need, principals were instrumental in the establishment of the DET's Educational Measurement and

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<sup>8</sup> Julia Gillard M, Deputy Prime Minister;

[http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches/Pages/Article\\_081107\\_162857.aspx](http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches/Pages/Article_081107_162857.aspx)

<sup>9</sup> A sample page illustrating what a school's profile might look like was widely distributed in April, 2009

School Accountability Directorate and have worked constructively with it at every step along the path to the present stage and will expect to continue to do so.

### *3.3.1. School accountability and reporting in NSW*

The current evaluation and planning processes used in NSW public schools are open and inclusive of staff, students, parents and community members. A comprehensive and transparent reporting regime ensures that the school's community has access to meaningful information about overall results in external examinations as well as detailed evaluations of the school's internal operations and performance.

Within NSW DET, an integrated accountability and support structure for schools currently exists which includes the following elements:

- an annual school self-evaluation process
- a 3-year cycle of school planning
- annual school reports
- annual principal and teacher assessment reviews.

Where they are needed, the structure also provides for:

- performance improvement programs for principals and teachers and
- school reviews (including support teams, program reviews and management reviews).

NSW public schools provide an annual school report (ASR) containing a rich compilation of information for parents and community members. These reports include a wide range of data about the school and its achievements, delivered in a manner that is intended to be accessible and meaningful to the school's community.

The mandatory elements of the report include:

- messages (Principal, P&C and/or School Council, student representative)
- student enrolment profile and attendance profile
- class sizes (primary and central schools)
- post-school destinations and retention to Year 12 (secondary and central schools)
- staff retention and attendance
- staff qualifications
- professional development expenditure
- a financial summary
- significant school programs and initiatives (including Aboriginal education, multicultural education, respect and responsibility, and, for those participating in the programs, PSFP, PAS and CAP)
- student performance on national and state testing (NAPLAN, School Certificate and HSC)
- performance against national minimum standards (Years 3, 5, 7 and 9) for reading, writing, language conventions and numeracy
- value-added information (growth from Years 3 to 5; relative value added Years 5 to 10 and Years 10 to 12)
- outcomes of key evaluations in curriculum and educational and management practices
- parent, student and teacher satisfaction
- school development (progress on targets in 2008 and targets for 2009 as recorded in the School Plan 2009-11)



Reporting practices across all NSW schools also include twice-yearly academic reports to parents on the progress of their child, incorporating A-E grades defined against syllabus outcomes, with measures to facilitate consistency in teacher judgement.

Parent-teacher interviews are organised at least once per year, with the availability of further interviews by arrangement as the need arises. Parents are routinely contacted individually in the event of emerging problems with attendance, participation or other needs. Parents all receive individualised printouts from NAPLAN testing and the Essential Science Skills Assessment (ESSA).

### *3.3.2. How is the NSW education system performing?*

Given the large fraction of Australia's school student population – around one-third of the total<sup>10</sup> – that resides in NSW, much that can be said about Australian education as a whole is also a statement about NSW. Breaking down the PISA results for the various jurisdictions in Australia finds NSW in the upper rankings on all dimensions, though not at the top on any of the literacy, mathematics or science data.

Asking a similar question of the 2008 NAPLAN data produces a similar result. NSW ranks well overall among the states and territories, with a 97% participation rate and sharing the top three places on most measures with Victoria and the much smaller ACT. This is actually an outstanding result, considering the profile of the NSW student population, reflected in the fact that around 44% of federal low-SES funding is allocated to schools in NSW<sup>11</sup>. This strong result derives in large measure from the determined focus on literacy and numeracy in NSW primary schools over the past decade.

Nevertheless, looking closely at the data will identify issues to which we must attend. A major issue for NSW, as for all jurisdictions, is the performance of some of our Aboriginal students, as well as those students in isolated locations or areas of poverty, compared to the remainder. Some of the gaps are embarrassingly large.

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<sup>10</sup> 2007 Statistics from <http://cms.curriculum.edu.au/anr2007/pdfs/2007Stats.pdf>

<sup>11</sup> NSW Implementation Plan for National Partnerships

## 4. The Collection and Use of Data

*“Weighing pigs won’t make them fat”.*<sup>12</sup>

Testing and reporting may identify the trends; testing and reporting will not provide solutions. As useful as data-gathering can be, it is not an end in itself. More is not necessarily better, especially if the data is ignored, misapplied, or misinterpreted.

A central tenet of the political argument for test-based accountability is that *“parents have a right to know ...”* with the implication that important and useful information is currently being withheld from them. This assertion is usually extended to the idea that more information will, or should, enable parents to “choose” between schools; ignoring the important questions of ethics and equity that are implied in a market-based conception of education. Counter-arguments by educational interest groups are invariably portrayed by politicians and the media as essentially self-serving and arising from a fear of accountability.

Our society routinely accepts legislative and regulatory limits on the free access to information where the negative consequences of disclosure are held to be of greater moment than the positive benefits that might flow<sup>13</sup>. In the case of the publication of test results, there is overwhelming evidence of both the negative consequences for education of such a policy and of the failure of these measures to deliver the kind of enlightened public understanding that was anticipated by their advocates.

This section explores some of the issues involved in the collection and interpretation of school data.

### 4.1. Methodology

Statistical tools and methods are important in evaluating the efficacy of particular pedagogical approaches and elements of school organisation. They can also be useful, along with a range of other data, in assessing the performance of individuals and in identifying areas of underperformance or excellence. However, the dangers in relying on limited or flawed statistics are embodied in the phrase *“lies, damned lies and statistics”*.

Debates around the collection and publication of educational data inevitably engage with some of the more esoteric features of statistics that are routinely misunderstood or abused. A few of these are discussed below.

#### 4.1.1. Statistical error

Whenever educational data is gathered there is an associated and inevitable degree of uncertainty in the result, usually referred to as *“error”* or, more descriptively, *“possible error”*. This means that there is a range above and below the quoted value in which the true value may lie. Because of this, we should not regard a single percentage test score as a true, absolute and incontestable measure of, say, a student’s achievement in science; there will be random effects or unrecognised biases for which we cannot account. Generally, if we average a number of test scores by that student on that subject matter, we can hope to reduce the uncertainty, but we will not eliminate it, even if we manage to keep other variables constant, which is hardly ever the case.

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<sup>12</sup> Old farmer’s saying.

<sup>13</sup> For a more detailed exposition on these matters, see: Cobbold, T; *“Reporting School Results Does Greater Harm Than Good”*; <http://soscanberra.com/league-tables/reporting-school-results-does-greater-harm-than-good>

The more that data of different kinds are combined and reworked in calculations, the more the uncertainties can compound to increase the uncertainty in the final result. It is a testimony to our general ignorance of this fact that we comfortably allocate a first place prize to the student who scored 95% on a multi-part assessment over one who scored 94%, often without a second thought that the two measurements may be subject to uncertainties of at least a few percent and are, in statistical terms, indistinguishable. When we quote percentages, we are routinely assuming – whether we realise it or not – that we are able to measure a student’s achievement to within  $\pm 0.5\%$

This leads us to the issue of *significance*, a statistical concept through which we calculate the likelihood that an observed difference between two measures is due to a real difference in what is being measured, or due to random, unrelated effects. Generally, there is no justification in ranking one individual or group above or below another if the differences between them are not “*statistically significant*”.

#### 4.1.2. Sampling

As noted earlier, all of the valuable insights from the PISA testing were obtained from a sample of students in each country. It was not considered feasible or necessary that every 15-year-old student in every country should complete the survey. There are well-established protocols for ensuring that the samples used are representative of the population as a whole and that the data gathered are robust and meaningful. There are also well-established processes for stating the margins of error and for determining the statistical significance of the findings.

As it is currently implemented, NAPLAN sets out to test every student in the nation, creating vast expense and disruption, amounting to two teaching days for each Year 3, 5, 7 and 9 cohort across the nation for the tests, in addition to the time devoted to specific preparation for the tests, to the detriment of all other educational purposes. This raises major questions of cost-benefit when testing a sample of students would achieve the same result. Nevertheless, NSWSPC recognises that parents, students and schools receive useful diagnostic data from these tests and the NSWSPC continues to support national tests that provide diagnostic information to assist teaching and learning.

On the other hand, sample groups which are too small give unreliable results, with a large degree of possible error. While true of most, if not all schools, this is particularly significant in smaller schools, where the averaged results of cohorts of students can vary significantly from year to year, even with other factors held constant. As a consequence, using the average for any single year as a measure of “school achievement” can be quite unreliable.

#### 4.1.3. Comparing Schools

The typical pattern for school average test results shows that approximately 80 per cent of these results overlap when 95% confidence intervals are applied to the scores. This means that the vast majority of our schools are clustered so closely on average test performance that their error ranges (see 5.1.1) substantially overlap<sup>14</sup>. In other words, the performance of those schools cannot be meaningfully distinguished from one another by average results alone. It follows that any ranking of those schools based on average test results in a given year (i.e. “league tables”) cannot be justified on the statistics since they are all effectively equal on that measure and any apparent differences between them cannot be ascribed to a “school effect”.

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<sup>14</sup> Kenneth J. Rowe; *Assessment, League Tables and School Effectiveness: Consider the Issues and Let’s Get Real!*; Journal of Educational Enquiry, Vol. 1, No. 1, 2000

To put it another way, NSW secondary schools with essentially similar performances would find themselves spread over a range of several hundred places in a ranked league table.

As to the remainder, a relatively small number will be significantly higher than the majority on test measures. Almost invariably, these will be schools whose enrolments have been selected on academic merit or are otherwise advantaged by the social/economic milieu in which they operate. Similarly, there will be a small number that will appear significantly lower on performance measures. Again - almost invariably - these will be in areas of geographic, socioeconomic or other disadvantage that schools alone cannot address. In both cases, the situation is well known to system authorities and government.

The very small number of schools that may be genuinely under- or over-performing represent a quite small needle in a very large haystack and they won't be identified by looking at one test result. In order to compare schools meaningfully, a wide range of data – including trends over time – is an essential starting point, preferably informed by on-the-ground observations and experience of how the school operates. There is no simple, “quick-fix” way to do it.

#### 4.1.4. “Like” Schools

All proposed school comparisons begin from the assumption that the educational merit of a school's work is somehow faithfully encoded in the average performance of its students on one or a small number of tests and that this can be decoded with sufficient precision to meaningfully encapsulate and differentiate the relative merits of different schools.

Schools are such complex and dynamic institutions that any attempt to define “likeness” must end in a compromise between error-laden simplicity on the one hand (e.g. size, locality, etc) and absurd and ethically dubious complexity on the other (e.g. England's Contextual Value-Added formula<sup>15</sup>).

Like school comparisons are attempts to make a flawed premise appear credible. Since the underlying measure (e.g. an average test score) is so demonstrably flawed, attempts are made to find schools that are similar on one or a few of the more obvious external variables affecting performance (e.g. socio-economic status<sup>16</sup>). The assumption is made that if schools are similar in this/these respects, then they ought to produce similar average test scores. Where they don't, the differences (it is claimed) must reflect the competence or otherwise of the school's personnel, ignoring all of the other variables at work such as home background, infrastructure, resources, location (especially in relation to competing schools), isolation and cultural demography (See 5.2 below).

The reality is that the differences may – or may not – reflect the competence of the school staff or the efficacy of its programs. That is why like-school comparisons can sometimes be useful as a management tool in flagging schools that might need a closer, more detailed performance review. But that is the limit of their usefulness: the compounding of uncertainties inherent in their creation disqualify such comparisons from use as a reliable (read: “*publishable*”) performance measure.

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<sup>15</sup> See <http://www.standards.dfes.gov.uk/performance/1316367/CVAinPAT2005/> The CVA score combines - and then averages - measurements of up to fifteen student variables to control for the school's context. Almost all of these variables introduce increased uncertainty in the final calculation, so it has to be considered a case of diminishing returns. In addition, some of the variables linked to ethnicity and background raise significant ethical concerns.

<sup>16</sup> It must be observed that the implied acknowledgement that socio-economic status *does* affect student outcomes does not sit well with “one-size-fits-all” resourcing policies.

#### 4.1.5 Validity of school testing data

In the light of the increasing importance being given to school data it is important to consider the extent to which the results of school tests say something about the impact of schools compared with the impact of other learning experiences. We know, for example, that children develop a substantial portion of their literacy in the home, while schools tend to have a greater impact in numeracy. A significant portion of state and national tests are generic in nature and draw on each child's standard of literacy and background knowledge.

Recent research in the United States shows that achievement tests do not adequately separate school and non-school effects on children's learning.<sup>17</sup> The test scores then become a function not just of school practices but of non-school or contextual factors. This becomes problematic particularly when we include disadvantaged schools in the mix of any comparisons - we can end up substantially comparing the characteristics of communities rather than the efficacy of their schools.

#### **4.2. Purposes of data collection**

The federal government claims that individual testing is necessary in order to identify areas of need so that remedial action can be taken. The reality is that it adds a very expensive and disruptive layer of testing in order to establish something that is already well known to teachers, schools, systems and parents. From the range and quantity of data currently collected, governments - both state and federal - are well aware of the pockets of disadvantage that exist and the (relatively few) schools that may be underperforming. Likewise they are already well aware of those schools where innovative principals and teachers are working with their communities to break new ground and enhance outcomes for students. To claim otherwise is disingenuous at best and misleading or mischievous at worst.

Research has shown that between-school differences account for only around 10% of the variation in student learning outcomes<sup>18</sup>. On the other hand, within-school differences account for between 30% and 40% of variation. The remainder - the majority of the variation - depends on factors related to the students themselves. Thus, the use of between-school comparisons of test results provide little insight or value to help guide improvements in student outcomes. In reality, as noted in 4.1.5, these comparisons reflect the community context of the schools much more strongly than they reflect school effects and the publication of such comparisons can mislead and can unfairly stigmatise (or unfairly favour) particular communities.<sup>19</sup>

#### **4.3. Data Protection**

Notwithstanding the data already available, is there any real problem (apart from the cost and the disruption) with collecting comparable school- and student-level performance data nationally? The answer to this question would have been different prior to 2009<sup>20</sup>. Until then, the protocols for collecting and reporting data on schooling ensured protection of the identity of the student, the

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<sup>17</sup> Downey, Hippel and Hughes (2008) "Are "Failing" Schools Really Failing? Removing the Influence of Nonschool Factors from Measures of School Quality" *Sociology of Education* Volume 81, Number 3, July 2008

<sup>18</sup> Rowe, K. (2003) "*The importance of teacher quality as a key determinant of students' experiences and outcomes of schooling*"; background paper to keynote address presented at the Australian Council for Educational Research (ACER) conference, 2003 pp1 - 51.

<sup>19</sup> The treatment of one Western Sydney school by the media in January 1997 ("Class We Failed") is the type example of stigmatising a community by the simplistic misuse of data.

<sup>20</sup> NSW had a ban on reporting of HSC data (aside from the "high achievers") since 1997 which was removed by legislation in June 2009

school and the system that provided it. The assurance of confidentiality is a natural and commonplace protocol used almost universally in psychometric settings. It gives confidence that the data collected is honest and accurate and ensures that it will not be used to harm or disadvantage the individuals and institutions that provided it.

Since mid-2009, this protection, at least in respect of schools and systems, has been removed, changing the nature of the process entirely. The testing is no longer a matter of benign, diagnostic fact-finding and research: it is now a high-stakes, competitive event in which the focus is not on the broad spectrum of educational outcomes, but on the results which students can be trained and coached to achieve within the narrow context of the test.

#### **4.4. *The Impact of Testing for Publication***

As the record of high-stakes testing elsewhere shows, there is now clear and irresistible motivation to manipulate the schools' curriculum, organisation and teaching program toward a single-minded focus on the NAPLAN testing. There is even, as has been the experience elsewhere, motivation toward corrupt practices such as manipulating enrolments and test attendance, divulging/coaching the actual test content, or even altering students' responses. Campbell's Law, a well-known adage in social research states: *"the more any quantitative social indicator is used for social decision-making, the more subject it will be to corruption pressures and the more apt it will be to distort and corrupt the social processes it is intended to monitor"*

As with all high-stakes, competitive events, the educational marketplace and the media can be expected to take a keen interest in the results. While the government may eschew "simplistic league tables", the media certainly doesn't and we cannot seriously expect that they will not publish their own rankings of schools, devoid of any of the contextual data or analysis that would give their readers insight into the real situation of the schools. Whatever the rhetoric of the government around "rich data", it is highly likely that the only data to receive attention from the media – and many members of the public - will be test scores. Neither the federal education minister nor any of her state counterparts have provided any credible assurance that this will not happen.

#### **4.5. *International Experience***

Until recently, Australian governments (like many of the governments in the world's best-performing education systems) have resisted the urge to use, or permit the use of narrow test measures on selected parts of the school curriculum to judge the educational outcomes of schooling.

Internationally, there is growing evidence that jurisdictions that fund and plan education based on national testing and league tables create systems that, far from improving education, are actually failing to prepare young people for the demands of the 21<sup>st</sup> century. Teachers and students have been forced into *"arid curricula"* tailored to the needs of previous centuries rather than the challenges of this century. Where children are seen as products and units rather than complex human beings with a myriad of talents, the damage caused by reductionist approaches has been considerable.<sup>21</sup>

In the United States, the implementation of the "No Child Left Behind" (NCLB) policy, based heavily on the publication of test data, has been accompanied by an overall decline of US rankings in international terms, along with an increase in the gap between top and bottom levels of student

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<sup>21</sup> Boston, Ken; *"Our early start on making children unfit for work"*; *Sunday Times, UK*; 26 April, 2009

achievement.<sup>22</sup> In addition, a study undertaken in Houston, Texas, the heartland of the NCLB policy has shown definite and deliberate narrowing of the curriculum in order to improve test scores<sup>23</sup>.

Closer to home, the former president of the NSW Board of Studies, Professor Gordon Stanley said. *"We could well end up with a similar situation to the UK, where you get a whole industry created around improving performance on the tests rather than necessarily improving students' learning skills ... that has led to a lot of teaching to the test and schools focusing on kids who are close to achieving the targets on the view that they are going to be the easiest to improve"*<sup>24</sup>. It has been reported that the latter focus on borderline students has seen a drop in performance at the higher levels due to a shift in the deployment of teaching resources.

#### **4.6. A better way**

Quite properly, governments want to be able to determine if the funds expended on education are being translated effectively and efficiently into student learning. In the international context, the best school systems use and report on a range of measures including measures of input, outcomes and, in the most successful systems, the effectiveness of their initiatives. In this way, those governments and systems – not just their schools – demonstrate their accountability in terms of education.

In NSW, governments have had access to sophisticated data on every public school student and school for almost 15 years. This places NSW as a world leader and ensures that bureaucrats and schools, especially public schools, can draw on a range of historical, trend and predictive data. It also means that the NSW government could have, at any time in the last 15 years, made changes to address the performance of students in different schools and resourcing based on student learning needs. The data relating to those changes needs to be shared more widely than it is at the moment and it needs to be examined more critically in terms of the real impact of government and DET initiatives on student outcomes and wider social policies.

It is the position of the NSW Secondary Principals' Council that the current model of development, reporting and accountability in NSW public schools provides a world-class operational base of data, systems and expertise. The model focuses on capacity building and development of schools and their personnel; at the same time providing a comprehensive body of information to the communities we serve. The history of the NSWSPC shows a long-standing commitment to improving the quality of our schools. Principals constantly promote proven policies and practices in order to achieve this improvement. Much of the current agenda of the federal government and its stated intent in relation to transparency does not constitute proven policy and practice.

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<sup>22</sup> Butland, D. (2008) *"Testing Times - Global trends in marketisation of public education through accountability testing"* NSW Teachers Federation Eric Pearson Study Report; Sydney; NSWTF

<sup>23</sup> McNeil, L. (2000, June). *"Creating new inequalities: Contradictions of reform."* Phi Delta Kappan. 729-734.

<sup>24</sup> Patty, A: *"School tests could fail students: educator"*; 26 March 2009

## 5. The NSWSPC Position

### 5.1. Principles

To ensure that school accountability, reporting and development are conducted in an ethical manner, appropriately reflecting the richness and complexity of school operations, the following principles are essential:

1. *Shared responsibility.* The education of all of our young people is critical to the growth and prosperity of the individual and to the social capital and economic prosperity of the nation. It follows that the responsibility for education is shared by students, parents, schools and government and is best achieved in the context of a cooperative, mutually accountable relationship. Within this relationship, it is the responsibility of teachers, school leaders, education authorities and systems, teacher training institutions and governments to openly and publicly account for their roles in the education process.
2. *Comprehensive Reporting.* The education of students for life and work in the 21<sup>st</sup> Century is more complex and fundamentally different from past conceptions of educational needs. Parents should be assured, through a comprehensive and transparent reporting process, that their school's procedures and programs are functioning effectively and are directed to the best interests of the students. A school accountability, reporting and development framework must reflect learning achievements and student progress across the full range of curriculum areas, as well as the development of citizenship, social skills, work skills and values.
3. *School-school comparisons.* Between-school comparisons of test results provide little insight or value in understanding and improving student learning outcomes and have the potential to mislead, especially when taken in isolation from the contextual factors within which the school operates.
4. *Confidentiality.* The rights of young people and their community to dignity, respect and privacy in relation to their educational performance must prevail over the media's freedom to publish anything they judge to be in their interests or their view of the public interest. Parents have access to a full range of contextualised information on their own school and any other schools that are of interest to them and so selective and impoverished extracts, tabulations and manipulations of that information out of its proper context serve no legitimate purpose. Information that directly compares individual schools or students must not be reported publicly without explicit permission of the schools or students involved. This principle should be established in legislation.
5. *Within-school focus.* Ongoing evaluation practices must be embedded into school operations as an integral part of the school's planning and organisation. These practices should be sufficiently comprehensive to develop a full understanding of performance at all organisational levels.
6. *Curriculum links.* Any form of assessment must be explicitly linked to the curriculum being studied by students at school and the associated outcome standards. Any centralised marking or analysis process should provide detailed feedback to schools linked to the specific syllabus outcomes tested and in a form that schools and teachers can use to inform the evaluation of their teaching programs in order to improve student achievement.



7. *School self-evaluation.* Principals, working with their school community, are in a prime position to analyse and evaluate the performance of their school and to create sustainable improvements where needed. School leaders and teachers must take responsibility for the analysis and evaluation of their programs and performance against an agreed framework of operational standards, which are explicitly stated and reflect the highest order in terms of educational practice.
8. *External Peer Review.* There is significant value in all schools participating in an external review of school practice on a cyclical basis every 3-4 years, provided this is carried out for the purposes of development and affirmation and is undertaken by peer educators who have acknowledged expertise and current school experience.

## **5.2. School Reporting 2010 – 2015.**

It is the position of the NSW Secondary Principals' Council that the current model of accountability, development and reporting be enhanced through the adoption of more sophisticated elements of evaluation and review, focussed on capacity building and development of schools.

These enhancements should include:

- The preparation and publication of an agreed set of exemplary practice statements which describe the performance of accomplished principals and schools within a rapidly developing educational context;
- The replacement of education support teams by cyclical school reviews by an external review team of expert educational practitioners under the leadership of outstanding principals from other NSW public schools; and
- an accreditation option to provide recognition, acknowledgement and celebration of the achievement of exemplary practice.

These elements are detailed in the following section.

## 6. Preferred Model of School Accountability and Reporting 2010-2015

### 6.1. The Provision and Use of Student Performance Data

The NSW Secondary Principals' Council is committed to the provision and use in schools of student outcomes data from all external testing, including NAPLAN, ESSA, School Certificate and Higher School Certificate examinations. Data from external testing is gathered at great public expense and can be a valuable resource to help in the analysis of pedagogical practice and to inform school planning. However, in most cases the current information provided to schools is not in a form that permits detailed, item-level or outcome-level analysis of performance.

#### 6.1.1. Data Analysis Packages

It is the position of the NSW Secondary Principals' Council that

- a. data analysis packages provided to schools from external testing should enable schools to analyse student performance in detail at the item level where most variance occurs and where interventions can be most effective. The data packages should incorporate or permit:
  - disaggregation of results to the question or item level;
  - aggregation by curriculum area at various levels and over time; and
  - disaggregation by relevant target groupings (gender, Aboriginality, etc)
- b. Council supports the provision of the following comparative data sets which, used in combination, can provide valuable insights into the effectiveness of teaching and learning programs at a school:
  - *Results measured against curriculum standards* provide detailed insight into the performance of students.
  - *State and national testing data* provides a legitimate benchmark against which school results may be compared.
  - *Data over time*, such as 4-5 year rolling averages<sup>25</sup>, provide a more accurate representation of overall school performance by minimising year to year variations.
  - *Student progress data measured against earlier performance* within the same curriculum area provides valuable insight into the effectiveness of teaching and learning programs.
  - In cases where student progress data is unavailable, *value-added data* provides a more limited guide to performance.

#### 6.1.2. Learning Management Systems

It is the position of the NSW Secondary Principals' Council that schools should be provided with a system, linked to the school's administration system, for the efficient tracking of students' attainments in relation to syllabus outcomes and standards frameworks where they apply.

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<sup>25</sup> Or, perhaps more meaningfully, "medians"

### *6.1.3. The Publication of Data from External Testing*

It is the position of the NSW Secondary Principals' Council that:

- a. schools will report an agreed range of performance data to their local communities, including absolute and value-added test results, in a way which provides a meaningful picture of the school's overall performance and the context in which it has been achieved;
- b. the data so reported, including any data set displayed on the ACARA website, is to be considered an integrated whole and must not be reproduced publicly in any edited, abridged, recalculated or otherwise altered form without the written permission of the principal;
- c. the publication of the results of external testing in the form of simplistic performance tables purporting to compare school performance is strongly opposed; and
- d. legislation should be enacted which quarantines this information from publication in ways that would mislead the public and unfairly stereotype communities.

### *6.1.4. Like school groupings*

The NSW Secondary Principals' Council considers like school group comparisons to be fundamentally flawed and of limited value (see 5.1.4), however, in the event that governments and administrators require their use, it is the position of the NSW Secondary Principals' Council that:

- a. the model used should be one in which discrete and variable like school groups are generated for each school;
- b. any like school index formed on the basis of socio-economic disadvantage should take into account the Accessibility Remoteness Index of Australia, with calculations for each student at the census district level and where possible, census groups of 20 households;
- c. the comparison group based on this index for a given school should have an equal number of schools above and below it; and
- d. The comparison should be based on 3-5 year averages rather than a single year's results

## **6.2. The School Evaluation, Planning and Reporting Cycle**

The NSW Secondary Principals' Council is committed to an ongoing process of school evaluation, planning and reporting as an integral component of a school's operation.

### *6.2.1. Statements of Exemplary Practice*

It is the position of the NSW Secondary Principals' Council that:

- a. a set of exemplary practice statements should be developed, through a consultative process, for learning,, professional teaching practice , school organisation and leadership;
- b. such statements, while not prescriptive, would be indicative of exemplary practice in each area and would take account of agreed standards frameworks where they exist; and
- c. the process of development should be led by the principals' associations and the DET and should include appropriate stakeholder organisations.

### 6.2.2. *School Evaluation*

It is the position of the NSW Secondary Principals' Council that:

- a. the core purposes of school evaluation are to provide a valid and reliable foundation for school planning and reporting, to identify areas for improvement and to celebrate successes;
- b. student performance data is fundamental to the evaluation process and all professional staff in schools should have access to analytic performance data and the skills to interpret and apply it appropriately;
- c. the school evaluation process should be embedded in school operations, with routine evaluation and review integrated into all school program areas; and
- d. the assessment of school operations and performance should be referenced to the agreed statements of exemplary practice.

### 6.2.3. *School Plans*

It is the position of the NSW Secondary Principals' Council that:

- a. the Principal, staff, students and community in each school should engage collaboratively in the development of a single, comprehensive and integrated 3-year school plan;
- b. planning processes should be responsive to the local context, regional and state priorities and emerging needs;
- c. school plans should include performance targets which are challenging, reflect the school's corporate purpose and embrace student learning, citizenship and social outcomes, with clear indicators against which progress is assessed;
- d. resources should be allocated to items in the plan as required and the processes used to allocate resources should be open and understood; and
- e. the school's financial management system should be sufficiently flexible to accommodate allocations made against items identified in the school's planning process.

### 6.2.4. *Annual School Report*

It is the position of the NSW Secondary Principals' Council that:

- a. the annual school report (ASR) should be an open, transparent and comprehensible reporting to the community of learning performance and the effectiveness of school programs and operations;
- b. the ASR should provide an ongoing and consistent review of the school's performance over time, incorporating the results of the school's self-evaluation, as well as other information relevant to the local school community;
- c. the format of the ASR should be sufficiently flexible to ensure that it can be presented in a way that is engaging and relevant to the local community; and
- d. the ASR should be signed by the principal, on behalf of the school self-evaluation team.
- e. The ASR should be readily available to the members of the school community and any parent seeking information about the school.

### **6.3. School Reviews**

The Council supports the continuation of most of the procedures already established under the School Development Policy of 1999 and recognises that, on occasion, there will be a need for intervention reviews. A proposed variation replaces the current education support team interventions by a voluntary, developmental, cyclical, peer-led, external review process.

It is the position of the NSW Secondary Principals' Council that:

- a. Council supports the continuation of school program and management reviews, as described in the existing School Development Policy;
- b. all school reviews should take account of Statements of Exemplary Practice when developed (see 6.2.1) to ensure consistent assessment of school operations and performance against criteria of the highest level; and
- c. in place of the current system of education support team interventions, schools should have the option to choose to participate in voluntary cycles of 3-yearly reviews of operations and performance. These would be conducted by a review team composed of internal and external members including principals, teachers and consultants with acknowledged school-based expertise and professional skills in assessing school performance.

### **6.4. School Accreditation**

NSWSPC supports the development of an accreditation process, the purpose of which would be to affirm the work of the school against quality standards and provide for the recognition, acknowledgement and celebration of the achievement of exemplary practice. The advantages of such an accreditation process include:

- an affirmation of the work of participating public schools against very high educational standards;
- a mechanism for publicly validating, acknowledging and celebrating exemplary practice in schools;
- the opportunity to recognise the teachers and leaders of high performing schools; and
- the opportunity for NSW DET to move towards a more comprehensive and professionally validated method of evaluating school performance.

It is the position of the NSW Secondary Principals' Council that:

- a. a system of accrediting high-level performance in schools should be established;
- b. accreditation to be based on the recommendation of the School Education Director, informed by an assessment by the cyclical review team indicating that school has, within its particular context, reached levels of exemplary performance in all of its operations;
- c. schools awarded accreditation are recognised and promoted to the community to affirm their outstanding educational provision; and
- d. accreditation is for the current review cycle.

## **7. Preferred Model of DET Accountability and Reporting 2010 – 2015**

### **7.1. Provision of data to schools and school communities by DET**

In the national and local debate on “transparency” in education, there has been an unbalanced position articulated in which it is only schools that are:

- accountable for reporting “student performance data” supported by contextual information about the school; and
- responsible for these outcomes, despite differential, and in the case of public schools, historically inequitable provision of funding and resources.

This is not an adequate position for the future. If NSW public schools are to continue to underpin the excellent performance of NSW in educational testing and student outcomes, the NSW government through DET, needs to change the way it communicates and provides data to schools. Further, it is expected that greater transparency will be required if the government’s commitment to improving equity outcomes is to be achieved.

It is the position of the NSWSPC that the NSW DET:

- a. should put in place new systems of doing business with and providing data to schools. In addition to the data packages required in 7.1.1, the NSWSPC expects that DET will provide to principals:
  - i. explicit information on the input costs of running the school including the costs of staffing, asset management, teaching & learning programs and specific programs;
  - ii. explicit information and transparency in relation to decision making in the allocation of special programs funding that does not go to all schools; and
  - iii. a commitment to increased transparency and accountability at local, regional and state levels in relation to the provision of data to schools;
- b. commits to increased principal authority in decision making about strategies for improving student learning based on a wider and deeper provision of data;
- c. commits to more rigorous academic research into the nature and limitations of data used to group schools and measure student performance with a view to developing more sophisticated and customised methods of assessment and reporting; and
- d. increase its research and measurement budget to support schools to implement strategies that will actually work and are able to be sustained. The NSW DET and schools have not been able to effectively measure the impact (effect size) of major strategies used in schools, networks of schools, regions and across the state due to the limitations of the research methodologies and measurement tools used to date.

### **7.2. Specific programs and political mandates**

One of the challenges facing public schools has been the implementation of large scale programs imposed by political mandate as governments implement short (and longer) term agendas. While NSWSPC welcomes many of these programs and the funding that has accompanied them, not all these programs have resulted in improved outcomes for students and a challenge for DET has been

to conduct meaningful research into the effect of these programs so that public funding is not wasted. More systematic, considered research will be required to achieve the kinds of changes that are signalled by the aggregated NSW student performance data.

In addition, while the NSWSPC has supported all the major reviews conducted periodically by the Auditor General's Department in recent years, the NSWSPC believes DET should undertake its own rigorous, systematic, periodic reviews of the effectiveness and achievements of its policy, resourcing, staffing and support programs to schools and publicly report on those reviews.

It is the position of NSWSPC that:

- a. all programs introduced as part of the government's platform should be subject to formative and summative research that measures and reports publicly on their impact;
- b. NSW DET should recognise schools, school communities and principals as internal customers of DET with a right to receive data and evidence about the effectiveness of DET policies, resourcing, staffing, technology and other school support programs;
- c. principals should be involved in the evaluation of DET policies, procedures, practices and programs; and
- d. NSW DET should resist the importation of programs from other jurisdictions that are culturally inappropriate for NSW and/or do not have strong evidence of success based on high quality research.

### **7.3. Compliance and auditing**

In recent years, principals and schools have been required to indicate their compliance with legislation and regulations through the implementation of DET policies and procedures. This has increasingly been done through checklists during the interview component of the PARs process and through systems of "paper sign off" (such as those for monitoring the HSC). In some areas, such as Occupational Health & Safety and Vocational Education and Training, desk audits are supported by external auditing to ensure compliance.

It is the position of the NSWSPC that the NSW DET:

- a. should consolidate and simplify the number of areas of compliance required within each policy area;
- b. should develop consistent and effective electronic systems for principals to use in monitoring and reporting the school's compliance with DET policies and procedures;
- c. should develop a simple, cyclical, state wide system of electronic desk audits of key policies, procedures and practices to be in place by the start of 2011. The model could be built on "paper systems" that have been developed by some SEDs to assist new principals to understand the cycle of policy development and review.
- d. should ensure that it meets the requirements of the OHS Act to provide consultation when changing compliance requirements and training for implementing all new or revised policies and procedures.
- e. provides evidence that all new principals and school executive have received training in the reporting requirements of particular policies and procedures.

## 8. NSW Secondary Principals' Council Recommendations

The NSWSPC recommends:

1. that the NSWSPC call upon the Commonwealth Government and NSW Government to develop protocols for the use and reporting of school test data in NSW and the nation which reinstate and reaffirm the sensitive nature of student and school data and are underpinned by:
  - the principles listed in 5.1 of this paper
  - a recognition of the success of the Australian education system to date, and the contribution of NSW schools to that success, and
  - the willingness of NSW public secondary schools to continue providing comprehensive, significant and thoughtful data to the parents, students, community and government. (Sections 1-3)
2. that the SPC provide appropriate resource materials to our members and encourage them to inform their communities and local members of parliament about the dangers of league tables and the overseas experience with these and other ill-conceived accountability measures for schools.
3. that, in recognising that the systems for school development, accountability and reporting in NSW public schools are among the best in the world, the government ensures that any proposed change has a sound evidentiary base.
4. that secondary and central school principals continue to work with DET officers in the development of systems of measurement, school accountability, development and reporting that recognise and build on the high quality of the current practices in NSW public schools. (Section 5.2)
5. that the DET continues to recognise the value of providing diagnostic data to schools and that the DET and Board of Studies provide item-level performance data to schools from statewide testing to inform planning and to inform teaching practice. (Section 6.1.1)
6. that a "learning management system" for secondary and central schools, keyed to the NSW syllabus outcomes and linked to the school data management system, be developed/purchased and deployed to schools as soon as possible. (Section 6.1.2)
7. that the NSWSPC executive support strong professional action to prevent publication of school league tables and further, that the NSWSPC gives government and media representatives strong feedback, information and advice on the complexity of educational measurement and the dangers to government of damaging the reputation of Australian schools, particularly in the international educational market. (Section 6.1.3)
8. that the publication of any comparative tables based on fixed groupings of "like schools" is opposed by NSWSPC as invalid, unreliable and potentially destructive. If the government requires the use of like school groupings, the NSWSPC would support a limited trial of the effectiveness of variable groups based on a floating scale that places the target school in a discrete group with schools above and below (Section 6.1.3, 6.1.4)
9. that the NSWSPC Executive establish a project for the development and implementation of:



- a. exemplary practice statements,
  - b. cyclical review processes, and
  - c. accreditation system
- ... as proposed in this paper (Section 6.2, 6.3, 6.4)
10. that the DET provide funding for the collaborative development of ongoing, registered, high-quality professional learning for all principals, executive and teachers in data management and analysis. (Section 6.2.2(b))
  11. that the NSWSPC call on DET to ensure that the government's provision of evaluation and planning data through DET to NSW public schools is comprehensive and transparent. (Section 7.1)
  12. that the NSWSPC work with DET and academic partners to develop evaluation and research tools that improve the quality of strategic evaluation in DET, including the measurement of the effect size of particular programs, strategies and initiatives. (Section 7.2)