



Re: *The Schools Assistance Act 2004*

**Draft Form of Regulations and Approaches to
Monitoring Compliance with Commitments and
Educational Accountability Requirements**

May 2005

The AEU has serious concerns about the way the Federal Government is using conditional Commonwealth funding to coerce the states and territories into compliance with its political interference in teaching and learning in the guise of educational “reform”, and imposing policies and practices which would normally be the subject of negotiation and agreement between the responsible Ministers.

The AEU supports the development and recognition of public schooling as a key provider of social infrastructure for the Australian nation as whole. Schooling should be (and be seen as) a nationally focused activity. However, the AEU firmly believes that variations must and will continue within and between states and territories.

In general the AEU supports measures to facilitate the mobility of school children and teachers between states and territories. However, this should not be understood as an argument for standardisation of curriculum to a point that constrains the capacity of teachers, schools and systems to be locally responsive. It must be acknowledged that short of regimented uniformity, any change of schools, even within the same state or territory, must involve some adaptation.

In moving towards greater national consistency in the schooling system the AEU rejects a ‘lowest common denominator’ approach, or developments which are likely to lead to a net loss of high quality, equitable education for students. While greater national coherence and consistency should be strived for, that should not be at the expense of the quality of education for students or teachers' conditions.

Despite Minister Nelson’s description of the current system as “a dog's breakfast”, various national mapping exercises have shown that there is considerable overlap between the curricula of different states and territories. In fact the similarities are greater than the differences.

The AEU supports approaches to reporting, certification and assessment in the compulsory years that are supportive of high quality, democratic curriculum.

It is clear and uncontroversial that:

1. parents are entitled to and should be provided with timely, meaningful information about their children's progress at school, including on a comparative basis against state-wide benchmarks, in critical areas of their education.
2. teachers and schools need information about student progress and achievement as an integral component of the ongoing planning and modification of educational programs and practices
3. schools systems need accurate and reliable data on system-wide performances and the effectiveness of system-wide policies, special programs and resource allocations over time, for monitoring and planning purposes.

What is not so clear and uncontroversial is whether mass standardised testing is the appropriate means of obtaining the best quality information for school systems about the effectiveness of programs, resource allocations and policies, and for parents and teachers on student achievement.

There is a substantial research base which demonstrates a range of concerns with mass standardised testing, including:

- limitations of basic skills tests in assessing much more than a narrowly defined set of literacy and numeracy skills
- unreliability as an accurate measure of the total of students' understandings, skills and abilities
- negative effects on teaching and learning, when, for example, 'teaching to the test' is either implicitly or explicitly encouraged
- limited efficacy of tests which in themselves only purport to test 'particular aspects of literacy and numeracy' to inform teaching strategies to improve the most serious

educational problems eg improving literacy for socio-economically disadvantaged students.

- incompatibility between paper and pencil tests and the diversity of a rich curriculum
- focus on the performance of skills rather than understanding
- use of results as an enforcement mechanism which undermines teacher professionalism
- testing is based on age progression which tends towards standardisation and conformity of expectations rather than optimal learning for every child
- standardisation running counter to the logic of local curriculum development and the undermining of efforts to devise high quality learning that is connected to the lives of local school communities
- the volatility of numbers, particularly in rural and remote schools where enrolment fluctuations can cause broad deviations of data and impact upon trends.

Standardised tests may be part of a balanced comprehensive assessment strategy which allows for balanced and informed decision-making. In order to do so however, they must be of high quality, be careful of the claims made on their behalf, be accompanied by clear statements of what they can and cannot do, and be developed and used in ways that avoid the dangers which occur when testing and reporting narrow or skew the curriculum. Where legitimate assessment and reporting practices can be made nationally consistent, it is clearly advantageous. The crucial issue is to monitor and measure the 'useful' data that is being collected and respond to it in a meaningful way, rather than allow national benchmarks and national reporting to become the focus of curriculum or teaching practices.

The AEU and its members are not opposed to the collection of data, but we have serious concerns when the collection and monitoring of this data is not built in to the process of professional practice and over-rides teacher professional judgement. For these reasons AEU

policy commits us to oppose the use of national testing as a means of monitoring and reporting the performance of individual schools and teachers and the public release of student performance data which can be compiled as league tables.

A multiplicity of factors influence a school's average test scores, among them school and class size, the socio-economic status of its students, and concentrations of student race-ethnic populations. The regulation which demands the provision of an array of decontextualised 'school performance information' in hard copy, on the Internet or on a billboard visible to the public is therefore of major concern.

The creation of education 'league tables' goes against the findings of international studies which show that they do little more than further demoralise some disadvantaged school communities that stand most in need of support and encouragement. It is disingenuous in the extreme to suggest that the sole intention of making the data available is to make schools 'accountable' to parents and inform 'parent choice'. It is possible to release appropriate, yet relevant, information to the community without using league tables and ranking schools. The Coalition Government's desire for school 'league tables' is well-known and this is simply a back-door method of achieving them.

We reiterate our view that legislation should guarantee the confidentiality of test results and not allow for the provision of data in ways which would allow for the ranking or comparison of results between particular schools. Where any information is to be released to be the public, there must be a guarantee on how that information is presented and ultimately used by the media.

In addition to these major concerns with the Government's national standardised testing and reporting regime, the AEU also has concerns around the questions of workload and resourcing.

The current mandatory literacy and numeracy testing programs in years 3, 5 and 7 that were contained in States Grants (Primary And Secondary Education Assistance) Regulations 2001 - Reg 4 and which were approved by MCEETYA between April 1998 and March 2000, have

already added to the workload of our members. The extension of the national testing regime to year 9, with added testing for years 6 and 10 Civics and ITC literacy, will further increase the workload of our members, as will the extension of the performance targets to the new areas of testing

The section of the regulations dealing with student reports/reporting to parents is particularly contentious. Parts (iv) and (v) present major problems, as they solely focus on the eight Key Learning Areas. Over the last several years, Tasmania, South Australia, the Northern Territory, Queensland and Victoria have implemented variations of the 'Essential Learnings' curriculum framework. There are important differences in the relationship between the 'Essential Learnings' and the KLAs in the various state/territory models with significant implications for assessment processes and practices, the resolution of which has massive workload implications for the AEU membership. Where state/territory curricula have been specifically designed to amalgamate the Key Learning Areas into the Essential Learning Frameworks, the Federal Government's demand that testing focus on the KLAs for the purpose of reporting on student progress, will create significant extra pressures on schools and teachers.

We also have concerns with other 'school performance information' which the new regulations propose to make public. These indicators are supposed to measure the performance of the school based on student achievement, teacher qualifications, staff and student morale and community acceptance. For example, staff attendance would reflect the number of sick days taken, which could then be interpreted as reflecting staff morale. It is in fact a far more complex indicator, and requires contextual information and analysis for it to be genuinely meaningful.

Regardless of the validity of the information presented as 'school performance indicators', research has shown consistently that it is the relatively advantaged parents who are most able to use and act on this information. International research indicates that the inevitable outcome of such developments is that some schools are labelled by some as failures with the resultant flight of students to other "better" schools. The needs of schools in areas that already have a high proportion of high needs students then increase and the school "report" worsens. It is a vicious cycle, and not one that a Government which insists that its educational funding is conditional on states/territories certifying that every school displays a poster advocating

‘Australian Values’, including ‘care and compassion’, ‘doing your best’, ‘fair go’, ‘respect’, ‘understanding, tolerance and inclusion’, should be perpetuating.

In this regard, the new requirement in Commonwealth regulations for a “functioning flagpole”, displaying a “Values for Australian Schooling” poster, and displaying the “National Safe Schools Framework” poster in all schools appears as populist hypocrisy of no meaningful educational validity.

It is difficult to understand how these proposals would be anything but disastrous for difficult- to-staff schools and hence increase the gap between the educational ‘haves’ and ‘have-nots.’ In the medium to long term, the new regulations threaten to change the very nature both of our schools and the working conditions of our members.