

# Submission in response to *A Flying Start for Queensland Children: Education Green paper for Public Consultation*

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June 2010

# Executive Summary

In February 2010, the Queensland Government released an education green paper, *A Flying Start for Queensland Children*.

The Queensland Studies Authority (QSA) submission responds to the proposed strategies for achieving the objectives of the green paper.

In relation to objective one: *“Improving children’s development, wellbeing and school readiness”*, QSA supports the proposal to introduce a reading awareness campaign and a volunteer reading program.

In relation to objective two: *“Improving transitions from primary to secondary school and supporting adolescent development”*, QSA supports the proposal to move Year 7 to secondary school in 2014.

The focus of this submission, however, is on the third objective of the green paper: *“Improving school discipline and the quality of teaching and setting high performance standards for all schools”*, in particular the proposal to merge the QSA, Queensland College of Teachers (QCT) and Non-State Schools Accreditation Board (NSSAB) to establish a new independent authority to be known as the Queensland Education Standards Authority (QESA).

While this submission should not be read as an endorsement of the proposal as currently outlined in the green paper, it has been prepared in a spirit of collaboration to inform and assist Government’s deliberations on how best to achieve its overall objective.

In broad terms, the submission discusses the compatibility of the existing functions of the QSA, QCT and NSSAB with the functions proposed for the new body. Importantly, it shows that the existing functions of the QSA must continue to be performed in the future and recommends that the proposed new body, should it be established, would be the most appropriate body to do so. However, in a submission of this length, it is difficult to do justice to the consensus decision-making, capacity building approach and collaboratively negotiated processes that characterise the way in which QSA performs its functions.

The submission also suggests that there is a significant range of risks for Government, especially in terms of maintaining existing quality assurance processes, in establishing a new body which combines the functions as outlined in the green paper. The QSA, QCT and NSSAB have established strong and productive relationships with schools and between school sectors and there is potential for unintended negative consequences, including a potential diminution of existing quality processes, to result from any decision to merge the three bodies and/or modify their functions.

Although the case for establishing a new body is yet to be made convincingly, QSA identifies a range of principles to be considered and makes some suggestions regarding a possible model. This model is based on the notion that working with schools to improve the quality of the services they provide for students and the school community should be the fundamental aim of a new organisation. As much as possible, this should be founded on the principles of collaboration rather than intervention or intrusion.

A possible model for a new body involves:

- the development of a comprehensive standards framework and performance indicators covering the full range of school key responsibilities
- licensing of schools, followed by a process of periodic accreditation, involving self-assessment and external review by trained assessors

- ongoing data collection and monitoring of performance, and
- public reporting to ensure accountability.

This model is aimed at creating a culture of continuous quality improvement in Queensland's schools in which a proposed new authority would work collaboratively with schools and school sectors to meet accreditation requirements and continuously improve the quality of education services. The focus of the model would not simply be on external measurement for accountability purposes. Its main aim would be to encourage individual schools to engage staff and the school community in the implementation of internal quality improvement processes – to work together to develop and implement high quality practices that deliver positive outcomes for students, rather than try to identify and address problems after they have occurred. Schools would not be required to implement identical procedures but would be provided with sufficient flexibility to identify activities, programs or procedures that are appropriate to their unique circumstances as long as they are consistent with the broad standards framework.

The submission then expands on the model outlined above by describing the key functions that should be performed by a new body. These include:

- **School Standards Development:** developing and maintaining a comprehensive standards framework that encompasses the full range of school responsibilities and is flexible enough to accommodate conventional differences in schools.
- **Research and Professional Excellence:** conducting research to inform the development of standards and support other functions, and delivering professional development programs and developing resources to promote performance improvement in areas covered by the standards.
- **Syllabus Development:** performing essential syllabus and guideline development activities during the implementation of the Australian Curriculum and into the future.
- **Australian Curriculum Implementation:** supporting schools to implement the Australian Curriculum during the period of transition.
- **Testing and Assessment Resources:** delivering existing and developing new testing and assessment programs.
- **Licensing and Accreditation:** licensing new schools and accrediting all schools on a cyclical basis.
- **Curriculum Quality Assurance and Certification:** implementing Queensland's senior assessment and moderation system to support certification and tertiary entrance processes.
- **School Quality Monitoring and Reporting:** collecting data and other information to enable the ongoing monitoring of school performance and reporting for the purpose of accountability.

The submission also addresses the need for:

- sufficient resources to be allocated to the proposed new body to ensure it is able to perform its functions effectively, recognising that some of QSA's existing functions are supported by substantial in-kind contributions from schools and school sectors
- statutory independence in which the new authority is accountable to the Minister, but independent from ministerial direction or influence on certain matters, and
- a governance structure that maximises the opportunity for efficient decision-making based on broad consultation and collaboration within and between schooling sectors and successful implementation of initiatives.

# 1. Introduction

In February 2010, the Queensland Government released an education green paper, *A Flying Start for Queensland Children*. The green paper has three objectives:

- *Improving children’s development, wellbeing and school readiness*, a proposal to introduce a reading awareness campaign and a volunteer reading program.
- *Improving transitions from primary to secondary school and supporting adolescent development*, a proposal to move Year 7 to secondary school in 2014.
- *Improving school discipline and the quality of teaching and setting high performance standards for all schools*, in part, a proposal to establish a new organisation with responsibility for ensuring that standards for curriculum, teaching and schools are met in state and non-state schools, and home schooling environments.

The Queensland Studies Authority (QSA) notes the first two objectives and supports the proposed strategies for achieving each. The bulk of this submission, however, focuses on the third objective, which features a proposal to establish an independent education authority, to be known as the Queensland Education Standards Authority (QESA), through the merger of the QSA, the Queensland College of Teachers (QCT) and the Non-State Schools Accreditation Board (NSSAB).

## 1.1 The proposal in summary

The green paper does not provide a detailed rationale for its proposal to establish a new body, apart from asserting that “school performance, as reflected in national and international tests and in educational research, needs to improve” (p. 19). It does, however, make clear that the Government’s objective in doing so is to improve school discipline and the quality of teaching and set high performance standards for all schools.

The paper suggests that a proposed new body would have certain characteristics. It would:

- set and monitor high standards for teachers and all schools across Queensland
- connect the standards for curriculum, teaching and schools
- ensure curriculum and assessment standards are built into university teacher training and school performance evaluations
- harvest best practice across the schooling sectors
- work with all stakeholders
- apply the same high standards to state and non-state schools, and to home schooling
- implement a common accreditation process that all schools would undertake, which involves school inspections, and
- provide independent public information about schools and their performance.

In effect, the proposal is for a new organisation to develop and implement an integrated quality improvement program for all Queensland schools that is based on common standards and an accreditation process. The proposed new body would have a set of roles and functions that are broader than the sum of the roles of the existing three independent authorities.

## 1.2 QSA submission

Since its establishment in 2002, the QSA has delivered a range of products and services to meet the needs of twenty-first century schools and it welcomes the opportunity to work with Government to build on its strengths and continue to improve educational standards in Queensland.

The absence of sufficient detail in the green paper makes it difficult to be definitive in preparing a response and endorsing the proposal. However, while the QSA does not, at this time, endorse the proposal for a new body as it is described in the paper, its submission offers some observations that are intended to assist Government in its deliberations. In making these observations, the QSA attempts to be positive and supportive of Government's intention in preparing the discussion paper, mindful that its ultimate goal is to improve the quality of education in Queensland's schools.

The QSA submission is organised around the following key themes:

- *Flying Start* objectives
- Existing organisations and functions
- Principles for effective operation
- A possible model
- Proposed functions
- Resourcing
- Independence
- Governance.

## 2. *Flying Start objectives*

While QSA's submission is focused on the proposal to establish a new statutory authority, it is important that it registers its support for the strategies aimed at achieving the first two objectives of the green paper.

### 2.1 *Objective 1 – Improving children's development, well being and school readiness*

QSA supports the proposals to build on the decision to provide universal access to a kindergarten program by implementing a reading awareness program and a volunteer reading program in schools.

QSA is already actively offering support and guidance in this area through the development of the *Queensland Kindergarten Learning Guideline* to support the teaching and learning and assessment of children aged 3½ to 4½ years. The guideline aligns with the national *Early Years Learning Framework* (EYLF) and has clear links with Queensland's *Early Years Curriculum Guidelines* to support continuity of learning throughout the early years. It will also link to the Australian Curriculum documents currently being developed by the Australian Curriculum, Assessment and Reporting Authority (ACARA).

From February to June 2010, the draft guideline has been trialled in 25 kindergarten/pre-Prep settings. QSA officers have supported trial teachers, gathering feedback which has been utilised to refine the guideline and will be the basis of advice when full implementation proceeds.

### 2.2 *Objective 2 – Improving transitions from primary to secondary school and supporting adolescent development*

The proposed strategy for achieving this objective is to move Year 7 from primary to secondary school. This would bring Queensland students into line with what occurs in many other states. It would also increase alignment with the Australian Curriculum which is being drafted with Years 7-10 as a stage of learning. There are many instances, particularly within P-12 schools, where this is already occurring and these would be useful starting points for identifying suitable approaches for transitioning Year 7 to secondary school.

For many years, Queensland has promoted a focus on middle schooling as an effective approach for meeting the needs of students in this age cohort. The practices that comprise middle schooling pedagogy and curriculum – such as cooperative learning, collaborative teaching, integrated curriculum, authentic assessment, and small learning communities – should apply equally to students of all ages and stages of learning.

There is considerable diversity in how and when students move through this stage of schooling and in the impact on their attitude to and success in learning. Increasing literacy and numeracy skills and knowledge are the essential ingredients for learning in every subject and for effective communication and participation in adult life.

Ultimately, the success of middle schooling in improving student outcomes depends largely on whether it operates under conditions that foster improvements in teaching. It may be argued that middle schooling requires more teacher collaboration and imposes a higher workload on teachers. At the same time, there is a greater responsibility on staff to develop a stronger professional community in their schools.

To attract, develop and retain high quality teachers, schools and systems will need to find ways to retain the benefits of traditional subject-based teacher leadership, while maintaining strength in pastoral care, curriculum relevance and pedagogy. The risks in doing so are in the following areas:

- The quality of teachers able to specialise, particularly in mathematics and science.
- The existence of many small schools, particularly in rural and remote areas where access to programs may not be viable
- Accommodating composite classes which will always exist because of student numbers and staffing policies.
- Lack of appropriate facilities.

QSA is well placed to provide leadership and support given its expertise in developing programs for students in this age cohort.

## 3. Existing organisations and functions

The green paper acknowledges that, historically, the QSA, QCT, NSSAB and three school sectors have played distinctive roles in overseeing the quality of education in Queensland. Each organisation has developed its own philosophies and practices in supporting the diverse range of Queensland schools. QSA advises Government to be mindful of the centrality of the QSA, QCT and NSSAB to education in Queensland and exercise caution in altering these well established relationships by merging the three statutory bodies and modifying their functions. While the objective of the green paper is worthy of further consideration, there is a danger of some unintended negative consequences occurring in the future.

The green paper does not describe the way in which the various functions of the QSA, QCT and NSSAB would be reconciled within a proposed new body, nor does it explain how this new body would work with the school sectors. The paper does not identify the full range of existing functions that would be continued under a new organisation, transferred to another body, or discontinued altogether.

QSA does not claim to possess an intricate knowledge of the functions and activities of the QCT and NSSAB and would not wish to misrepresent these organisations in its submission. However, it is necessary to make some general observations about the functions of both bodies to enable an assessment of the proposal in the green paper and then to inform the development of a possible model for a proposed new body.

### 3.1 QCT functions

The QCT's main functions include teacher registration (including pre-registration testing), monitoring compliance with registration requirements, investigating and resolving professional misconduct, approving pre-service teacher training and maintaining professional standards for teachers.

It would be possible for some or all of QCT's functions to be accommodated within a new authority. However, it would also be feasible for them to continue to be performed by a separate, independent body. This is the case in other areas, such as the health sector, where the full range of health professionals are registered, monitored and, if required, investigated by a variety of registration bodies independent of the public health system and private health providers.

One reason for maintaining a separation of functions is the potential for the activities involving the investigation and resolution of professional misconduct to compromise a new authority's standing as a partner with schools in the quality improvement process. There may be an impact on the proposed accreditation process if the key participants – teachers and principals – perceive this new authority as a quasi-investigative body.

In the area of teacher professional standards, a proposed new body could either assume this function or simply incorporate the QCT's professional standards within its own standards framework. Through its accreditation and monitoring processes, it could provide the QCT with useful feedback on the implementation of the standards in schools and potentially alert QCT to any issues relating to professional misconduct.

As long as there is a formal relationship between a new authority and the QCT that is defined in legislation, both bodies may remain independent from each other.

QSA notes the QCT's role in approving and monitoring pre-service teacher education programs and the green paper proposal to review university teacher training courses.



Consideration should be given to the best location for this function once a decision has been made on the establishment of a new body and the inclusion or otherwise of the QCT's functions within its jurisdiction.

## 3.2 NSSAB functions

QSA acknowledges that the role of NSSAB is complicated because it must deal with the varied and complex governance structures of non-state schools, which are significantly different to the relatively uniform governance arrangements of state schools. The organisation performs certain functions that could become essential functions of any new body that is to focus on accreditation of schools. These include the functions of accrediting non-state schools, periodically reviewing compliance with accreditation requirements, and conducting school reviews and other data collection activities.

The concept of "accreditation", as defined in the *Education (Accreditation of Non-State Schools) Act 2001*, is really a combination of both licensing and accreditation<sup>1</sup>, with a heavy emphasis on licensing and ongoing compliance with minimum standards.<sup>2</sup>

While the dual functions of licensing and accreditation may effectively be accommodated within a single organisation, as is currently the case with NSSAB, it would also be possible for them to be separated. A possible rationale for doing so would be to remove the responsibility for making decisions about whether a school should be allowed to operate, or continue to operate, from the organisation responsible for working collaboratively with it to continuously improve the quality of its education services. This may enhance the accrediting organisation's capacity to maintain an emphasis on quality improvement and develop productive partnerships with each school. However, it would certainly reduce the capacity for efficiencies to be achieved.

Regardless of whether the licensing and accreditation functions are to be separated or combined within a new organisation, it is essential that any decision to establish a new body is based on a clear understanding about what this organisation is to achieve. Is the emphasis to be on ensuring that minimum standards are being achieved by schools or is it to go further and also encourage continuous quality improvement?

The location of NSSAB's role in managing and investigating complaints about aspects of non-state schools is less clear than its accreditation role. In accordance with its legislation, the NSSAB mainly acts on complaints relating to whether the governing body of a non-state school is suitable to continue to be the school's governing body and a school's compliance with the statutory accreditation criteria prescribed by regulation. Many complaints are referred to schools or other bodies for action.

Similar to the QCT's function of investigating and resolving cases of alleged professional misconduct, NSSAB's complaints management function may best be performed by a separate, independent body. There is a danger that in performing this function, a new body

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<sup>1</sup> Throughout this submission, the term **licensing** is used to refer to a process for ensuring that new schools, before they commence operation, meet defined levels of quality by satisfying certain minimum standards. These standards may address legal requirements, curriculum, physical and financial resources, staff qualifications, etc. The term **accreditation** is used to refer to an ongoing process which focuses on continuous improvement strategies, achievement of quality standards, and ongoing education and consultation. Both are distinct strategies for measuring the quality of education services. The main difference is that licensing is focussed on the achievement of minimum standards at a point in time in order to establish whether the entity is allowed to operate.

<sup>2</sup> There is a legislated requirement for accredited schools to demonstrate continued compliance against minimum criteria every five years at the request of the NSSAB.

would compromise its overall aim of working in close collaboration with schools to promote quality improvement.

The NSSAB's functions of assessing and making recommendations to the Minister about eligibility for government funding, and reporting on funding acquittals, are not so obviously relevant to the functions proposed for a new body. However, such functions could be developed.

### 3.3 QSA functions

In a submission of this length, it is difficult to do justice to the consensus decision-making, capacity building approach and collaboratively negotiated processes that characterise the way in which QSA performs its functions. For example, the many ways in which QSA provides rich support for teachers in improving their pedagogy is not readily apparent from a brief analysis of its legislated functions. It is important that these intangible benefits are not forgotten in considerations about the establishment of a new body.

The following analysis of QSA's main functions considers whether they should continue into the future and assesses their suitability for inclusion within the functions of a new authority. From this analysis, it is clear that all existing functions, to a greater or lesser degree, must continue to be performed by QSA, a new authority or by another government body or bodies.

#### 3.3.1 Syllabus development, implementation and revision

Schools in Queensland plan and implement their own curriculum in response to the needs of their students. They implement syllabuses approved by the QSA, within parameters set by school authorities, as a key component of their curriculum.

Schools expect syllabuses that make it clear what students are expected to know and be able to do, what is essential and how to assess student learning and progress in meaningful ways. Standards are included in all syllabuses to provide agreed points of reference so that comparable judgments can be made about what students know and can do. These standards are supported by work samples with annotations to exemplify the standard and, in Years 11-12, a system of external moderation.

Even with the establishment of ACARA at the national level, Queensland still requires a body to:

- perform syllabus purchase and development functions in relation to non-Australian Curriculum subjects, especially in the senior years of schooling
- develop assessment advice and possibly reporting advice in relation to Australian Curriculum subjects
- implement both Queensland syllabuses, especially in Years 11 and 12, and Australian Curriculum in schools by producing support materials and delivering professional development.

If a new body is to be established, its capacity to develop curriculum and teaching standards and ensure that schools comply with these standards would be improved if it was also responsible for the development of the syllabuses and syllabus support materials from which the school curriculum is ultimately developed and also for the implementation of these syllabuses in schools, including the delivery of professional development. In doing so, this new body could assist schools to develop quality curriculum and assessment and support schools in meeting accreditation requirements.

### **3.3.2 Accreditation of syllabuses and guidelines**

Continuation of QSA's existing accreditation function is necessary to enable education providers who have developed their own evidence-based curriculum to have this curriculum endorsed for use in child care centres or schools. This function has a clear link to the standards development and accreditation role proposed for a new body. Accreditation of a syllabus or guideline could simply comprise one aspect of the overall accreditation process administered by a new body.

### **3.3.3 Testing – state tests**

The Queensland Core Skills Test (QCS Test) is a fundamental component of Queensland's tertiary entrance system and must continue to be delivered. To maintain public confidence in Queensland's system of tertiary entrance, it is essential that the QCS Test continues to be administered by a body that is independent of schools and the school sectors. Should it be established, this new authority would be the appropriate body to administer this test in the future.

### **3.3.4 Testing – common national tests**

Under the National Education Agreement, Queensland is required to participate in the National Assessment Program (NAP), including the National Assessment Program – Literacy and Numeracy (NAPLAN) tests. In the interests of transparency, independence, public confidence and accountability, it is essential that an entity independent of schools and school authorities is responsible for the administration of these tests and controlling their data. Additionally, these tests yield significant systemic data related to the performance of schools and their students, data which may be used by a new body in the monitoring and accreditation process and for reporting to schools and the community on school performance. Its role could also be expanded to take in the triennially-rotating National Assessment Program in Science Literacy, Information Communication and Technologies and Civics and Citizenship, and the administration of the Program for International Student Assessment (PISA) and Trends in International Mathematics and Science Study (TIMSS) tests, currently managed by school authorities.

### **3.3.5 Assessment, moderation and certification**

The Ministerial Council for Education, Early Childhood Development and Youth Affairs (MCEECDYA) has determined that assessment and certification are not within the remit of ACARA and will remain the responsibility of each state and territory. The assessment of senior students and the moderation of standards of achievement will therefore continue to be essential components of Queensland's certification and tertiary entrance processes. These processes underpin the awarding of Queensland Certificates of Education (QCE), the Queensland Certificates of Individual Achievement (QCIA), and rankings for tertiary entrance (Overall Positions).

Similar to testing, it is also important that a high degree of accountability and transparency is maintained in the process of assessing students for certification purposes. To ensure public confidence in the outcomes for Year 12 students, it would be essential that an independent body continues to perform these functions. The range of rigorous quality assurance processes involved in the assessment of senior students in Queensland could become an important part of the monitoring and accreditation processes to be undertaken by a new authority.

### **3.3.6 Tertiary entrance**

For as long as assessment and certification remain the responsibilities of each state and territory, Queensland will continue to require a system for ranking students for tertiary entrance purposes. It is essential that there is public confidence in the fairness and equity of this system. The proposed body's intended role in setting high standards, monitoring performance against those standards, accrediting schools and public reporting would make it well placed to ensure that high standards are maintained in the area of tertiary entrance. From the point of view of efficiency, it would also make sense for the same organisation to be responsible for both certification and tertiary entrance procedures.

### **3.3.7 Vocational education and training**

The Australian Government is in the process of establishing a national regulator for VET. It is understood that this body will continue the practice of delegating certain functions to state agencies to enable them to regulate VET programs. In Queensland, this will include registering schools as Registered Training Organisations (RTOs) and auditing registered schools to ensure they are meeting the Australian Quality Training Framework (AQTF) 2007 Essential Standards for Registration. The registration and auditing functions of QSA's VET in schools program would sit neatly within the accreditation function of a new body. If this body is to retain the functions of tertiary entrance and certification, it would also be well placed to ensure that student achievement in VET subjects contributes towards tertiary entrance.

### **3.3.8 Research**

QSA has had limited capacity to conduct research related to its functions. However, some important research projects have been undertaken by QSA officers, often in partnership with universities. Any proposed new body's functions would need to be informed by evidence gathered through research. In addition to having a statutory function to conduct research, a new body would need to be sufficiently resourced to do this work.

## 4. Principles for effective operation

Should Government continue with its proposal to establish a new authority with specific functions, it is important that some fundamental guiding principles are identified. From QSA's past experience, and its consideration of the green paper proposal, the following set of principles are proposed to inform the design and ongoing operation of any proposed new body:

- **A focus on quality improvement**  
First and foremost, any new body's focus should be on working with schools to improve the quality and equity of the services they provide for students and the school community. As much as possible, this should be a collaborative process, rather than one of intervention, which should be a sector responsibility.
- **Genuine independence**  
A critical component of the success of a new body would be its independence. This independence would need to be enshrined in legislation.
- **Effective legislation**  
The effectiveness of a new statutory authority would be highly dependent on the quality of its legislation. The legislation must clearly articulate the organisation's roles, functions and mode of governance and operation. It should also include sufficient powers for the body to require schools to provide information and make identified improvements. There should be appropriate consultation with stakeholders in the development of legislation to ensure enduring ownership of the roles and responsibilities of the new organisation. An appropriate review period should also be included in the legislation.
- **Appropriate resourcing**  
In order for a new body to perform its functions efficiently and effectively, it should be appropriately resourced and able to participate in government budgetary processes. While there is some scope for establishing efficiencies through the merger of the QSA, QCT and NSSAB, additional funding would be required if a new body is to retain the existing functions of these organisations, as well as acquire new functions.
- **Information exchange and transparent reporting**  
For a new body to perform its functions effectively, it would need to base its activities on comprehensive and robust data and other information. Similarly, for schools and school sectors to identify deficits and make improvements, they require access to reliable information about the performance of their own and other schools. The open and timely exchange of information would be a fundamental component of the accreditation and monitoring process, and crucial for transparent public reporting.
- **Strong partnerships**  
The QSA has always worked in partnership with schools, their communities and the state and non-state school sectors. It has involved teachers, teacher unions, parents, industry and education providers in the design, development and delivery of its products and services. Any new body should maintain QSA's focus on collaboration, consultation and inclusive governance arrangements in the way in which it delivers its functions, including its quality improvement activities. It must recognise and respect the differences that exist between the school sectors and their schools.

- **Clearly defined roles and responsibilities**

In order to achieve the efficiencies envisaged in the creation of a new body, and to ensure that it is able to perform its functions effectively, it would be essential that the roles and responsibilities of a new body and the three school sectors are clearly delineated and adhered to. Where duplication of functions has occurred in the past, it has frequently led to role confusion between the school sectors and QSA, and ultimately wastage of resources and conflicting messages to schools. This must not occur in the future.

## 5. A possible model

Although the case for establishing a new body is yet to be made convincingly, QSA has used the above principles as a guide in developing a possible model to inform Government's deliberations. The model is outlined in the remaining sections of this submission.

The QSA, QCT and NSSAB all currently perform a range of functions that would inform the development of standards by a new body. These include, for example, QSA's role in developing and quality assuring standards of assessment, the QCT's role in establishing and maintaining professional standards, and the NSSAB's role in defining accreditation criteria to ensure non-state schools meet appropriate educational standards.

The green paper proposes that a new authority develops standards in some areas that are well outside the existing functions of the QSA, QCT and NSSAB. The following five areas are identified for discussion:

- educational outcomes and improvement strategies
- curriculum and teaching standards
- school discipline standards
- student welfare
- parental and community involvement.

The identification and development of standards is an essential precursor to the accreditation of schools. Standards provide the benchmark for schools and school sectors to achieve and a framework for an independent body to assess performance. The five areas identified in the green paper do not encompass all school responsibilities but are an important subset of the full range of activities performed by schools. It is therefore important to realise that any accreditation process based on standards developed in these five areas alone will not address some important areas that impact on the overall performance of a school (e.g. administration and governance, school resources, school infrastructure, health and safety, etc). It could be argued that accreditation against these five areas would not guarantee that schools are performing to a satisfactory standard and continuously working to improve the services they provide.

Noting the green paper objective and the key characteristics it proposes for a new organisation (see introduction above), QSA suggests a more comprehensive model which involves:

- the development of a comprehensive standards framework and performance indicators covering the full range of school key responsibilities, with flexibility to accommodate conventional differences in schools
- licensing of schools, followed by a process of periodic accreditation, involving self-assessment and external review by trained assessors
- ongoing data collection and monitoring of performance, and
- public reporting to ensure accountability.

This model is aimed at creating a culture of continuous quality improvement in Queensland's schools in which any new body would work collaboratively with schools and school sectors to meet accreditation requirements and continuously improve the quality of education services.

The focus of the model would not simply be on external measurement for accountability purposes. Its main aim would be to encourage individual schools to engage staff and the school community in the implementation of internal quality improvement processes – to work together to develop and implement high quality practices that deliver positive outcomes for students, rather than try to identify and address problems after they have occurred. Schools would not be required to implement identical procedures but would be provided with sufficient flexibility to identify activities, programs or procedures that are appropriate to their unique circumstances as long as they are consistent with the broad standards framework.

## 5.1 Standards framework

The concept of accrediting schools against a comprehensive standards framework is not new. The Council of International Schools (CIS), for example, is one body that accredits over 500 schools internationally, including 10 Queensland schools. Its school evaluation and accreditation process is based on a standards framework that includes 60 standards with multiple performance indicators for each.

Any new body's standards framework should cover the full range of school responsibilities. Using the CIS model as a guide only, the following nine school key responsibilities are proposed for the Queensland context:

- Philosophy and objectives
- Curriculum and assessment
- Certification
- Governance and leadership
- Staff
- Student support
- Resources
- Student and community life
- Quality improvement.

The final responsibility is recognition that, for standards of education to remain high, schools, school sectors and the proposed new body should concentrate on promoting continuous quality improvement.

A range of standards would be developed for each school responsibility. The standards may be:

- mandatory
- a combination of mandatory and optional, or
- a combination of mandatory and developmental.

The standards would be explicit statements of expected quality in the performance of activities. They would need to be realistic, reliable, valid, clear and measurable. Some standards may be adopted from the work of other agencies (e.g., the Queensland College of Teachers' teacher professional standards) but they would need to be assessed for their suitability for inclusion within a new body's standards framework. For every standard, there would be one or more indicators or performance elements, each with realistic measures.

The standards would be flexible enough to accommodate conventional differences in schools, including alternative educational philosophies or a particular ethos. Schools would



not be compelled to develop identical quality improvement practices in order to meet the standards. The intention would not be to develop and implement a one-size-fits-all model which would impose unreasonable constraints on the way in which schools function.

## 5.2 Accreditation

With quality defined via the standards framework, a range of quality measurement processes may be employed to identify areas for improvement. As suggested above, a cyclical program of accreditation would be one key method for doing so. This process should be comprehensive and applied equally to all schools. Reflecting the flexibility of the standards framework, the accreditation program would not be aimed at ensuring all schools implement identical policies and procedures. Its focus would be on ensuring minimum standards are being met and that appropriate processes are in place to improve performance against the standards. The proposed new authority's legislation would require that all schools undertake accreditation and comply with its requirements and decisions.

Before any accreditation process could commence, schools would need to be licensed. For newly-established schools, this would effectively be managed through a modified version of the accreditation process aimed at ensuring all basic requirements were in place before the school could commence operation. For Queensland's existing 1,756 schools, provisional licenses would be granted pending confirmation via the accreditation process.

During the accreditation process, each school would be benchmarked against its own philosophy and objectives and the standards framework. The accreditation process would take place over a five-year cycle that could involve the following elements:

- an initial briefing
- a school self-assessment
- on-site review by the proposed new body's officers or trained reviewers whose role would not simply be to identify problems but would also involve working collaboratively with school staff to identify and implement improvement strategies
- preparation of a report for a school to convey the accreditation decision (made available online)
- an opportunity to review and possibly contest the accreditation decision
- a school report to the proposed new authority on improvement activities
- a peer review by a trained officer from another school

The cycle would then be repeated, commencing with notification to complete a school self-assessment.

The proposed new authority would support schools through the process, especially with the use of online tools to facilitate annual planning and self-assessment against the standards. Schools not meeting the required standards would be issued with a notice to remedy within an appropriate period. They would be provided with an opportunity to contest an accreditation decision and, if sufficient evidence is provided, the new body (or its trained reviewers) would conduct an onsite validation review, which may result in a change to the accreditation decision.

## 5.3 Quality Monitoring

The proposed new organisation's cyclical program of accreditation should be supplemented by an ongoing method for measuring the quality of school performance. Ideally, this would

be an online data collection tool for schools to use to regularly upload data on measures of performance for particular key standards. The aim of the quality monitoring program would be to only collect data and other information that demonstrates core requirements are being met and supports the quality improvement process. Duplication of other existing data collection activities of the school sectors or the Australian Government would be avoided.

The data tool would integrate outcomes and other performance measurement data into the accreditation process and would allow a new body, at any point in time, to produce a report on an individual school or a comprehensive system-wide snapshot. There should be a legislative requirement for schools to provide the required data and other information for quality monitoring purposes.

The application would allow a new body to monitor the health of the education system, ensure compliance, and report publicly. Schools and school sectors would also be able to access the data to support them in their efforts to improve quality and prepare for accreditation.

## 5.4 Public Accountability

The data and other information accumulated from the proposed new authority's accreditation and quality monitoring activities would allow it to provide public reports based on independent information about school performance. The reports should encompass an appropriate profile of measures that provides an insight into the performance of schools against key standards and demonstrates the efforts of schools to make and sustain improvements in priority areas.

The timely publication of this information via the proposed new authority's website would assist in maintaining public confidence in the education system and the activities of the new body itself.

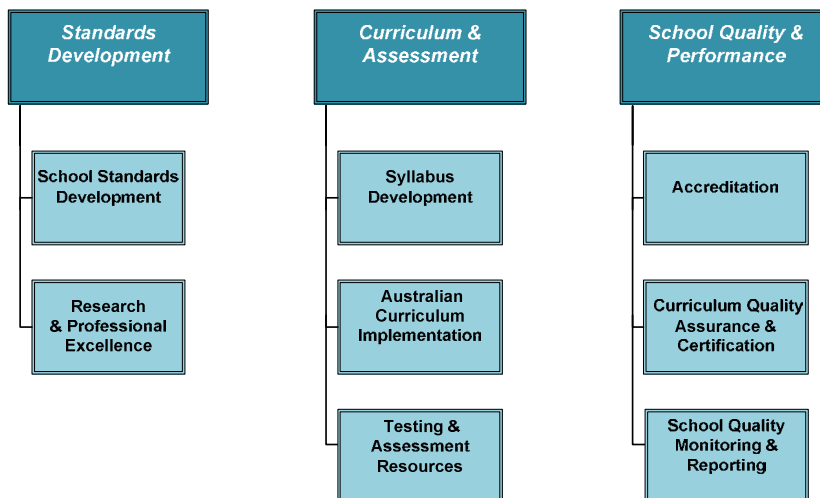
## 6. Proposed functions

This section outlines, in summary form, a potential set of functions for a new body, incorporating all of the existing functions of the QSA:

- School Standards Development
- Research and Professional Excellence
- Syllabus Development
- Australian Curriculum Implementation
- Testing and Assessment Resources
- Licensing and Accreditation
- Curriculum Quality Assurance and Certification
- School Quality Monitoring and Reporting

Figure 1 illustrates how these functions may be categorised under three broad headings: **standards development**, **curriculum and assessment**, and **school quality and performance**.

*Figure 1*



## 6.1 School Standards Development

This function would initially involve the development of a comprehensive standards framework, including widespread stakeholder consultation. Ongoing activities under this function would include the development of communication materials, different forms of training packages, and assessment tools related to the standards. There would also be a need to assist in accreditation reviewer training, review existing standards, and develop new standards.

## 6.2 Research and Professional Excellence

For a new organisation to be more than a body that defines standards and then measures the way in which individual schools interpret those standards and implement them in their own setting, it should also have a function to conduct research and promote professional excellence.

The research products should inform the development of the standards and support other functions, especially those that relate to curriculum, assessment and certification. This research should also be made available to schools, stakeholders and the public. Key products would be guidance and training packages that are:

- designed to promote high educational standards
- relevant to school-based professionals
- based on the best evidence, and
- assist schools to comply with the standards.

The proposed new authority would also offer professional development programs and resources aimed at promoting professional excellence. By ensuring that teachers and school administrators are appropriately skilled and have access to tools that support them to improve their practice, a new body would be able to influence the way in which its standards are implemented in schools.

Unlike QSA, these professional development activities would explicitly address pedagogy (historically the role of the school sectors), although only insofar as they promote performance improvement related to specific standards. This would be consistent with the intent of the green paper, which suggested a role for the proposed new body in improving teaching standards. Coordination and collaboration with the school sectors would be crucial in this area.

## 6.3 Syllabus Development

This function would address Queensland's continuing role in performing certain syllabus and guideline development activities during the implementation of the Australian Curriculum and beyond. It would involve development of:

- syllabuses in areas not within the remit of ACARA
- assessment advice and advice on reporting requirements for Australian Curriculum learning areas
- support materials and delivering professional development to support syllabus and guideline implementation.

This function is currently being performed by QSA.

## 6.4 Australian Curriculum Implementation

This function is related to Syllabus Development but is included separately. As the Australian Curriculum is incrementally developed, it must be effectively implemented in schools. QSA is currently playing a central role in ensuring that this occurs as seamlessly as possible. This involves, for example, revising curriculum documents, providing advice to schools on curriculum and assessment plans, developing guidelines and handbooks, and providing professional development.

## 6.5 Testing and Assessment Resources

This function would incorporate QSA's existing testing and other assessment programs. These include the Year 1 Assessments, NAPLAN tests, Queensland Comparable Assessment Tasks (QCATs), the Assessment Bank, the QCS Test and External Senior Examinations offered as a safety net for a small number of Queensland students.

## 6.6 Licensing and Accreditation

This function refers to the licensing of new schools and the cyclical accreditation of all schools. On-site school reviews as part of the accreditation process would be the most labour intensive aspect of this function. While the proposed new body's staff would be involved in undertaking some of these reviews, the majority would most appropriately be conducted by trained reviewers, engaged as consultants, who had past experience working as teachers, principals, school administrators, or academics.

All other aspects of the accreditation program would be managed under this function, including the training of reviewers.

In many respects, this function would replicate the activities currently being undertaken by the NSSAB and extend them to state schools.

## 6.7 Curriculum Quality Assurance and Certification

This function would cover existing activities conducted by QSA as essential components of the senior certification process. QSA currently implements the senior assessment and moderation system and certification processes. These are essential for students to demonstrate and improve their learning achievements and plan for their future, and also benchmark Queensland students against national standards and support school improvement processes. The assessment and moderation functions allow QSA to determine procedures and implement quality assurance for Queensland's system of continuous school-based assessment in the senior phase of learning.

This function would allow a new body to manage certification and reporting processes that reflect student learning across the range of their school experiences, capture student achievement in their various endeavours, and provide personalised, up-to-date information to students and parents. The QCE and the QCIA would continue to be issued to eligible students under this function.

The new accreditation function would enable a similar level of quality assurance to be applied to the P-10 curriculum (through, for example, moderation activities and year-level curriculum plans to be developed by schools). The main difference is the rigour that must be in place in the senior years to meet certification and tertiary entrance requirements.

## 6.8 School Quality Monitoring and Reporting

This function involves the collection of data and other information to enable the ongoing monitoring of school performance and the production of reports for various purposes.

QSA currently collects a wide range of testing and performance data from Years 2-12 and possesses the expertise to analyse, evaluate and report statistical and related information about educational outcomes, which may be used for the purpose of accountability and reporting, research and analysis, and system improvement.

This existing data would be supplemented by other school and student performance data collected through the accreditation process or uploaded by schools via the data collection tool in accordance with reporting requirements. The data collection and analysis tool would resemble the Department of Education and Training's (DET) Corporate Data Warehouse in scope and functionality. In fact, the proposed new authority's role in performing this function would be akin to the Performance Measurement and Reporting Branch in DET.

The data collected by a new body would be used to inform its research activities, fulfil its role in reporting to schools, school sectors and to the public, and ultimately improve school performance.

## 7. Resourcing

If, as suggested above, a proposed new body is to retain the existing functions of the QSA and NSSAB, as well as acquire new functions, it would require sufficient resources to ensure it is able to perform its full range of functions effectively.

Many of QSA's current activities are either partially funded or not funded at all. They are supported by QSA's own-source revenue, reprioritisation of existing resources, or through the goodwill of teachers, schools and school sectors. The development of items for the Assessment Bank, for example, is funded from within QSA's existing resources. The recurrent funding for the ongoing implementation of the Queensland Curriculum, Assessment and Reporting (QCAR) Framework is not for this purpose.

Of most significance, however, is the work currently performed by teachers in supporting Queensland's system of externally moderated school-based assessment. This includes the professional commitment of teachers in progressively assessing student progress throughout Years 11 and 12, and participating in district and state review panels. Teachers and schools receive little remuneration for this work, with schools bearing the brunt of the actual cost to the system as a whole.

QSA's past experience would suggest that the following must be in place at the point of establishment of a new body:

- A clear understanding of the resources that would be allocated to a new body and the core outputs that will be delivered for that funding.
- A process for determining specific purpose funding for the delivery of additional outputs.
- A mechanism for a new body to seek funding for its own internal priorities that is independent of DET's budgetary processes.

Furthermore, additional one-off and recurrent funding would be required to meet the costs of new functions.

### 7.1 Establishment Costs

An example of where one-off funding would be required is in the area of information and communication technology (ICT). As discussed above, the quality monitoring, accreditation and reporting functions of a new body would require an efficient mechanism for the collection and analysis of school data. The QSA currently has a complex ICT application environment consisting predominantly of applications developed in-house as well as some vendor based solutions. This is partly due to the amalgamation of the three original statutory bodies in 2002, in which QSA inherited and merged three discrete ICT environments and their respective support infrastructures.

A new body's activities would need to be supported by a sophisticated and robust ICT infrastructure that is more advanced than QSA's and NSSAB's ICT environments. It is important that sufficient funding is made available to replace QSA's ageing and redundant infrastructure with a single enterprise application environment based upon common functionality, application code, tools and technologies aligned with new organisational architecture.

## 7.2 Recurrent costs

Sections 5 and 6 above suggested certain new functions for a new authority over and above those currently performed by QSA and the NSSAB. The budgets of both QSA and NSSAB would represent major contributions to a new body but would be insufficient to meet the costs of new functions. Additional recurrent funding would be required if new functions were to be implemented successfully and the third objective of the green paper achieved. The major new functions identified above for which this funding would be required are:

- School Standards Development
- Research and Professional Excellence
- School Quality Monitoring and Reporting
- Licensing and Accreditation

Some additional resourcing would also be required in the corporate services area to provide the necessary administrative, financial, human resource management and in-house legal support for the functions.

The most costly function would be licensing and accreditation. There are currently 1,756 schools in Queensland (74% state and 26% non-state). Of these, 74% are primary schools, and 26% secondary or P-12 schools.

Some of these schools would already have been accredited by the NSSAB or another accreditation process. In these cases, provisional licences could be granted for a period of three years, during which time they would be required to complete a self-audit process.

Working with advice from the school sectors, the remaining schools would be granted interim licences. A process would then commence to transition these schools to full accreditation over the ensuing three years, with certain schools being prioritised for review.

At the end of the three year period, provisionally accredited schools could then be reviewed during the following two years, thus achieving accreditation of all schools within a five year period.



## 8. Independence

The 2009 Webbe-Weller Review found that there was a compelling public interest case for the independence of a body performing the functions of the QSA.<sup>3</sup> This observation is even more pertinent in the case of a new authority responsible for the accreditation and monitoring of schools in both the state and non-state school sectors and public reporting of school performance.

QSA contends that there is a need for statutory independence in performing the functions proposed for the new body. Any new body should be accountable to the Minister, but independent from ministerial direction or influence on certain matters (e.g. professional matters associated with syllabus development and assessment).

Statutory independence would:

- maintain transparency and accountability by ensuring that performance of the important functions of standards development, licensing and accreditation, syllabus development, assessment, certification, tertiary entrance and public reporting is free from political interference
- ensure that the interests of a particular school sector do not take precedence over the interests of other sectors
- maintain stakeholder buy-in for products and services
- ensure the consistent application of standards and processes across all schools, and
- maintain public confidence in education outcomes.

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<sup>3</sup> Webbe, S. & P. Weller, *Brokering Balance: A Public Interest Map for Queensland Government Bodies*, Part B Report of an Independent Review of Queensland Government Boards, Committees and Statutory Authorities, Queensland Government, 2009, p. 178.

## 9. Governance

The QSA is currently governed by a board supported by public servant officers. It is proposed that this model of administrative support should continue with the establishment of any new authority.

QSA's current board is broadly representative, and is comprised of the state and non-state school sectors, teachers, teacher unions, principals, parents, tertiary institutions, industry, and vocational education and training sector representatives.

There are essentially two options for Government to consider in its deliberations on the appropriate composition of a new authority's board:

- a broadly representative board, as is currently the case for QSA, or
- a smaller board comprised of key stakeholders, such as the schooling sectors and teacher unions.

The strongly held view of many education stakeholders is that any new board should be broadly representative. Government is faced with the risk of alienating many stakeholders should it elect to depart from past practice and establish a new authority governed by a smaller board.

Regardless of the final composition of its board, any new body should also have in place appropriate mechanisms for involving a wide range of education stakeholders in its work, including the development of its products and services and influencing its strategic directions. This could be achieved through an appropriate legislated standing committee structure, where there is broad stakeholder representation, and possibly through the establishment of an advisory council that meets twice a year to provide the board with feedback and advice on the organisation's activities.

Consideration should be given to including Aboriginal and Torres Strait Islander representatives at all levels of a new body.



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