



Queensland
Government

**Non-State Schools
Accreditation Board**

Record number: 20/329484
Phone: (07) 303 45257

13 July 2020

Dear Chairperson

The Non-State Schools Accreditation Board is writing to all non-State school governing bodies to provide a summary of the outcomes of the 2020 census collection for non-State schools administered and verified under the *Education (Accreditation of Non-State Schools) Act 2017* and the *Education (Accreditation of Non-State Schools) Regulation 2017*.

The census was conducted on 28 February 2020 in accordance with the timeline prescribed in the Regulation. It involved 525 non-State schools (576 sites), which are governed by 167 governing bodies. Of the 576 sites, 558 were offering classroom education only; 10 were offering classroom and distance education; two were offering distance education only; and three were boarding sites.

Authorised persons appointed by the Board under the Act conducted enrolment verifications in the period from 16 March 2020 to 20 March 2020 in 20 non-State schools on 21 sites involving 8,295 verified enrolments.

Due to the COVID-19 pandemic, the Board ceased all on-site field-auditing activities on schools' premises effective from close of business, 20 March 2020.

The census data were passed over to the Department of Education on 17 April 2020 to enable the payment of the Ministerial recurrent grant instalment to schools' governing bodies in May 2020.

In terms of domestic students: 136,836.8 were primary and 144,088 were secondary, giving a total of 280,844.8 students.

This shows an increase of 10,377.8 students from February 2019 which constitutes a 3.84 per cent growth. The total enrolment numbers include 3491 students receiving distance education from the 11 schools (12 sites) accredited for distance education.

Of the total number of domestic full-time and part-time students:

- 12,205.2 were students requiring ESL tuition
- 12,380.8 were Indigenous students
- 12,026.9 were students with disability
- 6,204.8 were students from isolated zones (remote and very remote) and
- 5,443 were boarding students

In addition to domestic students, there were 1,972 overseas students and 362 'Students on Visitor Visas, Bridging Visas or No Visa'.

For the sample of schools selected for enrolment verification, the Board-appointed authorised persons verified whether full-time and part-time enrolments satisfied the requirements prescribed in

Floor 8 Education House
30 Mary Street Brisbane 4000
PO Box 15347 City East
Queensland 4002 Australia
Telephone +61 7 3034 5257
Website www.nssab.qld.edu.au
ABN 53 636 704 278

the Regulation in order to be included on the census. They also verified the number of enrolments entitled to be categorised as domestic, overseas students or 'Students on Visitor Visas, Bridging Visas or No Visa', as well as students requiring ESL tuition, Indigenous students, students with disability, students from isolated zones, and boarding students.

The enrolment verification program highlighted several areas of concern.

Availability of documents

The authorised persons observed that there are still schools that do not save, or have readily available, the reports that they used to compile the census data on Census Day. The schools then have to recreate the information for the enrolment verification by running reports retrospectively. This can lead to false results or results not matching the data reported in the census if changes have been made since Census Day.

The *Education (Accreditation of Non-State Schools) Regulation 2017* prescribes:

5. School survey data and associated documents

- (1) A school must keep school survey data for the school, and associated documents—
 - (a) for at least 5 years after the day to which the data relates; and
 - (b) in a way that ensures the integrity and security of the data and documents.
- (2) For a student mentioned in section 29(3) or 30(3), a school must keep a record of—
 - (a) the reason for the student's absence from the school; and
 - (b) why the student's absence was considered to be for a reason beyond the control of a person mentioned in section 29(3)(c)(i) or (ii) or 30(3)(c)(i) or (ii).
- (3) In this section—

associated document means a document that records or includes a detail about a student mentioned in section 27, 29 or 30.

It is important to note that not only the data collection form must be kept for at least five years, but also all reports and documents that the school used to collate the information.

New staff

High discrepancies are often found in schools where new staff are responsible for completing the census data. It is important that schools implement a consistent approach for training new staff involved in the census collection.

Existing staff who have completed the census for many years also need to ensure they refresh their knowledge on all of the instructions provided every year and refer to each section while completing the census. The instructions are continually reviewed and updated.

Number of days notice for enrolment verification

Every year school staff provide feedback to the authorised persons that they did not have enough time to prepare for the enrolment verification. As mentioned earlier, the data and documents used to compile the census data must be retained by the school for at least five years and should be readily available after Census Day.

The Act requires an authorised person to allow for at least one day between the day the notice is given to the governing body and the day on which the entry is proposed [Act, s138(2)]. Usually the authorised persons provide three days notice, which is more than what is required by legislation.

Other findings through the workbook and validations

The newly introduced workbook provided a valuable snapshot of what measures are in place in schools to ensure the security and integrity of the school survey data and documents, and how schools are applying the rules regarding students not meeting minimum attendance requirements.

Refer to Appendix 1 for an extract of data derived from the workbooks.

Relevant period

The Secretariat received many phone and email enquiries regarding the relevant period and how this might apply to particular schools.

Section 26 of the Regulation states:

- relevant period, for a school, means the period—
- (a) starting on the first day that students are to attend the school in a calendar year; and
 - (b) ending on the relevant day for the year.

The relevant period applies to the whole school. If a school has staggered start dates for certain years of schooling, the earliest day that students are to attend the school for the year from any year of schooling will be the starting date for the relevant period. For example, a secondary school might start with year 7 and year 12 on the Monday and the remaining years of schooling on subsequent days of that week. The days that the school is operating, but is asking students from certain years of schooling not to attend, should be counted as absences beyond the control of the parent, guardian or student (if living independently).

If a school starts later than the usual Queensland Term Dates, then the relevant period will be shorter. The same “11 day rule” applies for full-time students regardless of when the school started. Please refer below for an extract from the Regulation:

29 When a full-time student has attended a school

- (1) This section establishes when a full-time student is taken to have attended a school for the purposes of the school survey data.
- (2) A full-time student is taken to have attended the school if—
 - (a) the student is enrolled at the school; and
 - (b) the student attended the school during the relevant period for the school for at least 11 days of the program or course of study for which the student is enrolled.
- (3) However, a full-time student is also taken to have attended the school if—
 - (a) the student is enrolled at the school; and
 - (b) the student attended the school during the relevant period for the school for less than the 11 days because of the student’s absence from the school; and
 - (c) the student’s absence was for a reason beyond the control of—
 - (i) if the student is living independently of the student’s parents or guardian—the student; or
 - (ii) otherwise—the student’s parents or guardian.

The Board has added some practical examples over the past few years regarding attendance requirements. These can be found in Appendix 2 of the census instructions.

Audit logs

Twenty eight per cent of schools that declared that they had electronic systems did not have audit logs available or turned on in the system(s) to track any changes to attendance data. This means that there is limited control over the integrity of data used for school survey data and data reporting in those schools.

An audit log keeps a chronological record of system activities from all users, to enable the reconstruction and examination of the sequence of events or changes. The use of an audit log reduces the risk that data may not be accurate. It also allows management to identify and deter unauthorised amendments. Schools without audit logs should investigate whether these are available in their current system and, if so, whether they can be turned on.

The Board has also prepared a number of questions schools and governing bodies may again consider in preparation for the 2021 census (refer to Appendix 2).

The Board is examining ways to further assist schools in 2021 on these matters and other

discrepancies, which arose in the 2020 census of enrolments.

Members of the Board trust that this summary is useful to the directors of the governing body.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lynne Foley', written in a cursive style.

Lynne Foley OAM
Chairperson

Appendix 1

Statistics

Display 1 shows the numbers of census returns that had one or more full-time student(s) who were present at the school for less than 11 days. The numbers show that for 441 census returns (75 per cent of all returns), the reasons(s) for absence needed to be considered for the student(s) who did not meet minimum attendance requirements, whether they were beyond or within the control of the parent/guardian or the student (if living independently).

Display 1: Number of census returns with full-time students not meeting minimum attendance requirements

Full-time students not meeting minimum attendance	Number of census returns
Classroom education	571
No	137
Yes	434
Distance education	10
No	3
Yes	7
Grand Total	581

Display 2 shows the number of students who did not meet minimum attendance requirements and whether they were eligible for inclusion due to their attendance. The total sum of students to be considered was 2432. Out of these, 1812 were assessed by the school or governing body as eligible for inclusion, while 620 were ineligible.

Display 2: Number of full-time students who did not meet minimum attendance requirements and whether they were eligible for inclusion

Mode of delivery	Sum of Total number of full-time students entered	Sum of Number of full-time students eligible for inclusion	Sum of Number of full-time students ineligible for inclusion
Classroom education	2334	1742	592
Distance education	98	70	28
Grand Total	2432	1812	620

Display 3 shows the numbers of census returns that had one or more part-time student(s) who were present at the school for less than the minimum period. Only 11 returns listed part-time students who did not meet the minimum attendance requirements.

Display 3: Number of census returns with part-time students not meeting minimum attendance requirements

Part-time students not meeting minimum attendance	Number of census returns
Classroom education	571
No	560
Yes	11
Distance education	10
No	10
Grand Total	581

Display 4 shows the number of part-time students who did not meet minimum attendance requirements and whether they were eligible for inclusion due to their attendance. The total sum of part-time students to be considered was 19. Out of these, 16 were assessed by the school or governing body as eligible for inclusion while three were ineligible.

Display 4: Number of part-time students who did not meet minimum attendance requirements and whether they were eligible for inclusion

Mode of delivery	Sum of Total number of part-time students entered	Sum of Number of part-time students eligible for inclusion	Sum of Number of part-time students ineligible for inclusion
Classroom education	19	16	3
Distance education	0	0	0
Grand Total	19	16	3

Display 5 shows the ten most common reasons provided for beyond the control absences. The most absences (842 or 34 per cent of all absence reasons provided) were for student illness, followed by late enrolments beyond the control of (326 or 13 per cent).

Display 5: Reasons for beyond the control absences¹

Reason	Count of reason
Student illness	842
Enrolled late due to reason beyond the control	326
Delay in return from planned travel due to reason beyond the control	221
Emotional issues and behaviour	181
Transferred from other school, but prevented from attending due to reason beyond the control	111
Illness of member of immediate family	108
Student free day	87
Suspension	86
Coronavirus	67
Family circumstances	59

¹ A broader category was assigned if free text was entered where possible and applicable.

Appendix 2

Questions that schools and governing bodies may consider in preparation for the 2021 census

Currency and completeness of enrolment records:

- How does the school ensure that enrolments of students are current from one year to the next?
- Do students enrol annually or otherwise, what processes are in place to ensure the students are returning to school?
- Are the following details on student files:
 - enrolment date
 - date of birth/age
 - residential address
 - whether the student identifies as an Aboriginal or Torres Strait Islander person
 - whether the student identifies as English not being the first or main language spoken at home
 - copy of the visa for overseas students and domestic students who are not Australian citizens?

For electronic record keeping:

- What system(s) is/are used by the school to record enrolments and attendance?
- Who has access to the system(s)?
- What controls are in place to ensure the security and integrity of information arriving at the school electronically?
- Who enters enrolment data?
- Who records attendance data and how often is the data recorded?
- Are audit logs available in the system(s) to track any changes to attendance data?
- Does the school perform regular reviews of the integrity and security of the data?

For paper-based record keeping:

- Where are the enrolment forms and attendance lists stored?
- Who has access to the forms and lists?
- What controls are in place to ensure the security and integrity of information arriving at the school via hard-copy?
- Who records attendance data and how often is the data recorded?
- What controls are in place to ensure the security and integrity over physical storage?

Records for attendance and absenteeism:

- Does the school have a policy and procedures for accurately recording absence types or reasons for those absences?
- What internal controls are in place to ensure that all absences are recorded?
- Does the school record attendance as well as absences?
- Does the school keep documented proof that a student's absence was beyond the control of the student's parent/guardian or the student (if the student is living independently of the student's parents or guardians).

Other documentation:

- Verification processes for English as a second language (ESL) – including documented annual assessment process
- Verification process for students with disability completed before Census Day and the review date for verification has not expired
- Distance education – records of regular engagement between teachers and students time sheets or student 'log' in records, monitoring completion of assigned work, assessment of student work by teachers, communications records between teachers and students.