



Queensland
Government

**Non-State Schools
Accreditation Board**

Record number: 21/364920
Phone: (07) 303 45257

12 July 2021

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 2021 census collection for non-State schools administered and verified under the *Education (Accreditation of Non-State Schools) Act 2017* (the Act) and the *Education (Accreditation of Non-State Schools) Regulation 2017* (the Accreditation Regulation).

The census was conducted on 26 February 2021 in accordance with the timeline prescribed in the Accreditation Regulation. It involved 536 non-State schools (593 sites), which are governed by 175 governing bodies.

Authorised persons appointed by the Board under the Act conducted enrolment verifications in the period from 15 March 2021 to 7 May 2021 in 86 non-State schools on 92 sites involving 50,155 verified enrolments.

The census data were passed to the Department of Education on 12 May 2021 to enable the payment of the Ministerial recurrent grant instalment to schools' governing bodies in May 2021.

Of domestic full-time and part-time students, 140,223.6 were primary and 149,242.8 were secondary, giving a total of 289,466.4 students.

This shows an increase of 8,621.6 students from February 2020 which constitutes a 3.07 per cent growth. The total enrolment numbers include 3,925 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:

- 12,632.6 were students requiring ESL tuition
- 13,350.72 were Indigenous students
- 12,636.14 were students with disability
- 5,967.1 were students from isolated zones (remote and very remote) and
- 5,407 were boarding students

In addition to domestic students, there were 1,550 overseas students and 332 'Students on Visitor Visas, Bridging Visas or No Visa'.

Refer to Appendix 2 for some further statistics.

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 the Accreditation 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.

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 enrolment verification program highlighted several areas of concern.

Availability of documents used to compile census data

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. Please refer to Appendix 1 for section 5 of the Accreditation Regulation that sets out the legislative requirements.

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.

The 'Beyond the control' test

For a full-time student to be included in the census, they must have attended the school for at least 11 days of the program or course of study for which the student is enrolled (further referred to as the 'minimum attendance requirements'). Please refer to Appendix 1 for section 29 of the Accreditation Regulation that sets out the full set of requirements.

If the minimum attendance requirements are not met, the student's absences need to be reviewed and a decision made whether the absences were beyond the control of the parent, guardian or student (if living independently).

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.

The online census form also helps identify whether a student can be counted given that all students not meeting minimum attendance requirements need to be listed individually, and the number of days beyond and/or within the control of the parent, guardian or student (if living independently) as well as the reasons entered on the form. The form will then work out whether the student can be included or not based on the information provided.

For all students who are assessed as being able to be counted in the census, despite not having met minimum attendance requirements, supporting documentation needs to be kept by the school for at least five years and needs to be presented to the authorised persons should the school be selected for enrolment verification. If sufficient documentation cannot be provided on the day, the students may be removed from the census data.

School enrolment and record keeping standards, including audit logs

The Queensland Auditor-General's *Follow-up of Oversight of recurrent grants to non-state schools (Report 15: 2018–19)* highlighted an increased risk for schools in connection with the integrity and security of census data and associated documents.

This risk relates to section 5 of the Accreditation Regulation (refer Appendix 1 for the relevant extract).

Schools should implement appropriate systems, policies and procedures to collect accurate information to correctly complete the census.

A total of 26 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 prepared a number of questions schools and governing bodies may again consider in preparation for the 2022 census (refer to Appendix 3).

Under-age preparatory students

A continued area of concern is the **enrolment of under-age preparatory year students** who are ineligible for enrolment under the *Education (General Provisions) Regulation 2006* (General Provisions Regulation), section 17.

The General Provisions Regulation prescribes the age that a child must be to be enrolled in the preparatory year at a non-State school. If a child does not fall within the criteria in section 17 of the General Provisions Regulation, they cannot be enrolled in the preparatory year. Please refer to the Appendix 1 for section 17 of the General Provisions Regulation that sets out the requirements in full.

Having regard to the age requirements above, a school that is not also operating a preschool program as an approved education and care service, regulated under the *Education and Care Services Act 2013*, can deliver a preschool program in a school if the program is delivered in a class or classes where a full-time education program is also being delivered to school children and the preschool program is being delivered to fewer than six children in the school (refer *Education and Care Services National Law (Queensland)*, section 5, definition of 'education and care service').

This means that a student who is below the prescribed preparatory year age can undertake a preschool program within a preparatory year class. The student cannot be enrolled in the preparatory year and is not eligible to be included in the census.

Number of days' notice for enrolment verification

Every year some 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, s 138(2)]. Usually the authorised persons provide three days' notice, which is more than what is required by legislation.

English as a Second Language assistance

Students requiring English as a Second Language (ESL) assistance is another area in some of the schools sampled where discrepancies were found. To ensure ESL students are eligible for inclusion in the census, the students must be assessed by Census Day, and documented evidence to support the principal's decision must be retained for five years in a way that ensures the integrity and security of the data and documents. This evidence must be available at the time of verification. Identification of students needing support should be done at least on an annual basis.

The Board is examining ways to further assist schools in 2022 on these matters and other discrepancies which arose in the 2021 census of enrolments.

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

Yours sincerely



Lynne Foley OAM
Chairperson

Appendix 1

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

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.

Education (Accreditation of Non-State Schools) Regulation 2017

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.

Education (General Provisions) Regulation 2017

17 Age for enrolment in preparatory year

- (1) The principal of a State school, or non-State school, may enrol a child in the preparatory year at the school only if the child will be at least 5 years and 6 months on 31 December in the proposed year of attendance at the school.

Example —

A child who turns 5 on or before 30 June in a year will be at least 5 years and 6 months on 31 December in that year.

- (2) However, the principal may enrol a child in the preparatory year at the school if –
 - (a) the child will be at least 5 years and 5 months on 31 December in the proposed year of attendance at the school; and

Example —

A child who turns 5 on or before 31 July in a year will be at least 5 years and 5 months on 31 December in that year.

- (b) the principal is satisfied the child is ready for education in the preparatory year, considering the child's attributes.
- (3) Also, the principal may enrol a child in the preparatory year at the school, regardless of the child's age, if the principal is satisfied the child –
 - (a) had started education in another State or country that is equivalent to the preparatory year; and
 - (b) is ready for education in the preparatory year, considering the child's attributes.

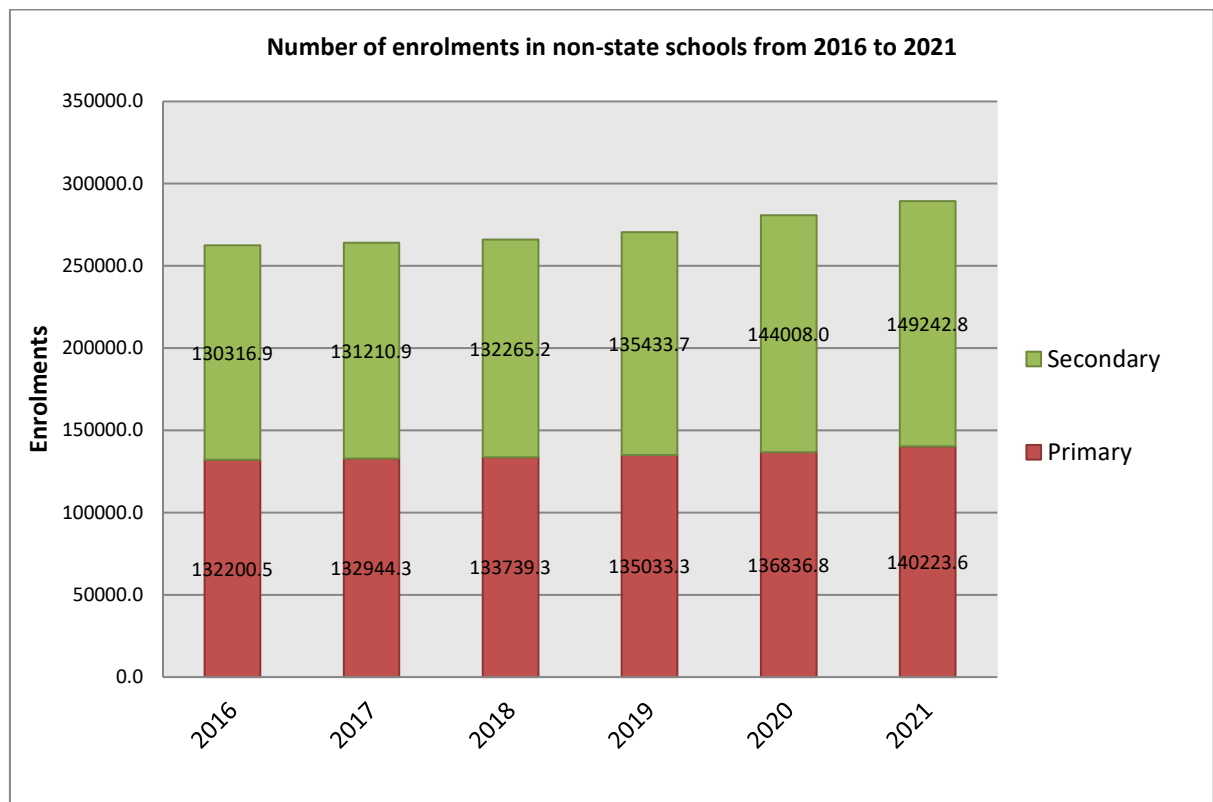
Appendix 2

Statistics

Enrolment trends, 2016—2021

- A total of 289,466.4 students were enrolled in Queensland non-state schools in February 2021.
- Enrolments in Queensland non-state schools continue to increase. From 2016 to 2021 enrolments grew by 26,949 students (10.27%).
- The average increase per year since 2016 is 1.98%.
- The average increase per year going back to 1997 (earliest data readily available) is 2.47%.

Year	Primary	Secondary	Totals	Changes from previous year	% Change from previous year
2016	132,200.5	130,316.9	262,517.4	601.6	0.23%
2017	132,944.3	131,210.9	264,155.2	1,637.8	0.62%
2018	133,739.3	132,265.2	266,004.5	1,849.3	0.70%
2019	135,033.3	135,433.7	270,467.0	4,462.5	1.68%
2020	136,836.8	144,008.0	280,844.8	10,377.8	3.84%
2021	140,223.6	149,242.8	289,466.4	8,621.6	3.07%



Enrolments by year level

To align with the shift in the compulsory school starting age from 2008, a smaller half cohort of students commenced Prep Year in 2007, and completed Year 12 in 2019. Numbers relating to the half cohort in year-level tables in this document are highlighted.

Year level	2016	2017	2018	2019	2020	2021
Prep	18,613.0	18,411.6	18,350.5	19,045.8	19,206.2	19,776.6
Year1	19,099.4	18,483.6	18,370.2	18,453.6	19,088.2	19,535.1
Year2	18,561.3	19,080.8	18,575.5	18,623.9	18,719.2	19,569.9
Year3	18,840.0	18,725.8	19,343.8	18,913.5	18,994.4	19,289.1
Year4	18,886.6	19,115.7	19,094.9	19,789.8	19,504.4	19,718.4
Year5	19,253.0	19,564.0	19,814.4	19,864.2	20,800.2	20,637.5
Year6	18,841.4	19,462.0	20,051.2	20,194.5	20,375.4	21,533.8
Pri USP	105.8	100.8	138.8	147.0	148.8	163.2
Pri UNS	0.0	0.0	0.0	0.0	0.0	0.0
Pri Total	132,200.5	132,944.3	133,739.3	135,032.3	136,836.8	140,223.6
Year7	23,130.4	23,590.9	24,263.2	25,488.5	25,564.1	26,348.7
Year8	22,318.0	23,204.9	23,794.7	24,412.0	25,715.2	25,924.4
Year9	17,067.8	22,254.3	23,258.4	23,859.6	24,594.8	25,906.3
Year10	22,726.0	16,994.9	22,094.2	23,245.2	23,966.0	24,817.3
Year11	23,291.4	22,640.7	16,978.5	21,989.5	23,150.6	23,950.9
Year12	21,702.9	22,444.8	21,768.2	16,340.1	20,911.5	22,157.1
Sec USP U15	32.8	35.0	42.0	32.4	34.8	33.0
Sec USP O15	7.6	8.4	17.0	17.4	18.0	23.2
Sec UNS U15	2.0	16.0	18.0	12.0	8.0	24.2
Sec UNS O15	38.0	21.0	31.0	37.0	45.0	57.6
Sec Total	130,316.9	131,210.9	132,265.2	135,433.7	144,008.0	149,242.8
Queensland	262,517.4	264,155.2	266,004.5	270,466.0	280,844.8	289,466.4

Appendix 3

Questions that schools and governing bodies may consider in preparation for the 2022 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 in 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 by means of time sheets or student 'log-in' records, monitoring completion of assigned work, assessment of student work by teachers, communications records between teachers and students.