

**Report on the survey into the
Nationally Consistent Collection
of DATA (NCCD) process in NSW
and ACT schools**

Message from the Secretary



Dear Members,

I am pleased to present this detailed report on the recently conducted survey into the Nationally Consistent Collection of DATA (NCCD) process in NSW and ACT schools.

For a number of years IEU members have expressed concerns about the complicated and onerous nature of the NCCD process and the many issues it causes for learning support staff in schools across NSW and the ACT. As a result, the IEUA NSW/ACT Branch undertook this comprehensive action research survey in order to identify the nature and extent of the issue.

We had responses from 334 schools which means that our members were highly engaged in this process, allowing us to proceed with confidence that the data is both valid and accurate.

I would especially like to thank the members who formed the initial focus group and who worked on developing the survey and finalising this report.

The union will now use the report as the basis for meetings with relevant employer and reporting bodies in order to address the significant concerns which members have identified. We look forward to bringing about changes which will both support the work of our members and assist the students in their care.

Mark Northam
Secretary

1 March 2021

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Background

Significant concerns have been expressed by IEUA members through chapter and sub branch meetings regarding the Nationally Consistent Collection of Data (NCCD) process in schools. In June 2020 this matter was brought to the attention of the IEUA Federal Education Issues Committee.

The IEUA NSW/ACT Branch subsequently resolved to undertake a detailed survey of its members to establish the nature and extent of the concerns. This survey was carried out in the second half of the 2020 school year.

Methodology

In July 2020, a working party of eight IEUA NSW/ACT members with direct responsibility for the NCCD process in each of their schools met at the IEUA NSW/ACT Wattle Street office.

Broad concerns surrounding the process including workload issues, ambiguity and confusion in data collection requirements, duplication of evidence requirements, and unsuitable online data collection platforms were identified at the initial meeting.

It was subsequently decided that a comprehensive survey of staff working in this area was required. IEU Professional Officers, Veronica Yewdall and Patrick Devery, took direction of the project and enlisted the support of Michael Elphick and Associates to develop a purpose-built survey.

Through an action research consultation process with the members of the working group, an initial survey was developed which was subsequently refined and finalised. The working group were given the opportunity to review the survey before it was distributed.

The IEUA NSW/ACT Branch contacted all schools in its database requesting that they nominate the person most responsible for the NCCD as the contact person for the survey. In order to maximise the reliability of the survey, it was decided that both IEU members and non-members would be encouraged to participate in the survey.

In total, 1314 schools were initially contacted, 427 schools replied providing the details of a contact person, and 334 individuals or learning support teams went on to complete the survey.

The survey provided both qualitative and quantitative response opportunities for participants and was structured to address the following general areas:

- NCCD staffing composition and structures within the school
- The students with disability cohort serviced by the school
- The workload impact of the NCCD process
- NCCD evidence management teams in schools
- Professional development implications
- NCCD online data collection platforms used in schools.

Shortly after the completion of the survey, respondents were invited to attend one of two online feedback sessions which provided them with initial analysis of the data. The draft of this report was also distributed to members of the working group for their contribution prior to final publication.

1.0 Executive summary

Survey participants included a representative cross-section of all IEU schools.

Findings from the survey indicate:

- 1.1 The NCCD process has a significant impact on workloads for learning support teachers, with nearly half of all respondents reporting they receive no additional release time and are undertaking five or more after school hours per week to complete the process. (Section 3.3)
- 1.2 The bulk of the NCCD workload across the non-government sector is being carried by a part-time workforce, and in the majority of cases this responsibility usually falls to a single person within the school. (Section 3.1)
- 1.3 The extensive administrative requirements and staffing limitations divert time and resources from the core work of the learning support staff. (Section 3.4)
- 1.4 Professional development aimed at facilitating the NCCD process appears to be taking priority over professional development specific to supporting students with special needs. (Section 3.6)
- 1.5 Most schools report significant numbers of students in the NCCD process, with the majority of primary schools providing data on more than 50 students, and three quarters of secondary schools dealing with in excess of 100 students. (Section 3.2)
- 1.6 An overwhelming number of respondents report they are required to submit the same or similar data on multiple platforms. (Section 3.7)
- 1.7 Most respondents report issues with uploading data during peak times, regardless of the platform being used. (Section 3.7)

2.0 Who were the respondents to this survey?

- 2.1 The IEU members and invited non-members who responded to the survey represent a broad cross-section of non-government schools, both primary and secondary across a range of sizes; from metropolitan Sydney, regional NSW, and the ACT; and from Catholic systemic, Catholic independent, and other independent schools.
- 2.2 There was a predominance of systemic Catholic primary schools in the final result.

Figure 1: Breakdown of respondents by school enrolment (primary, K-12, and secondary)

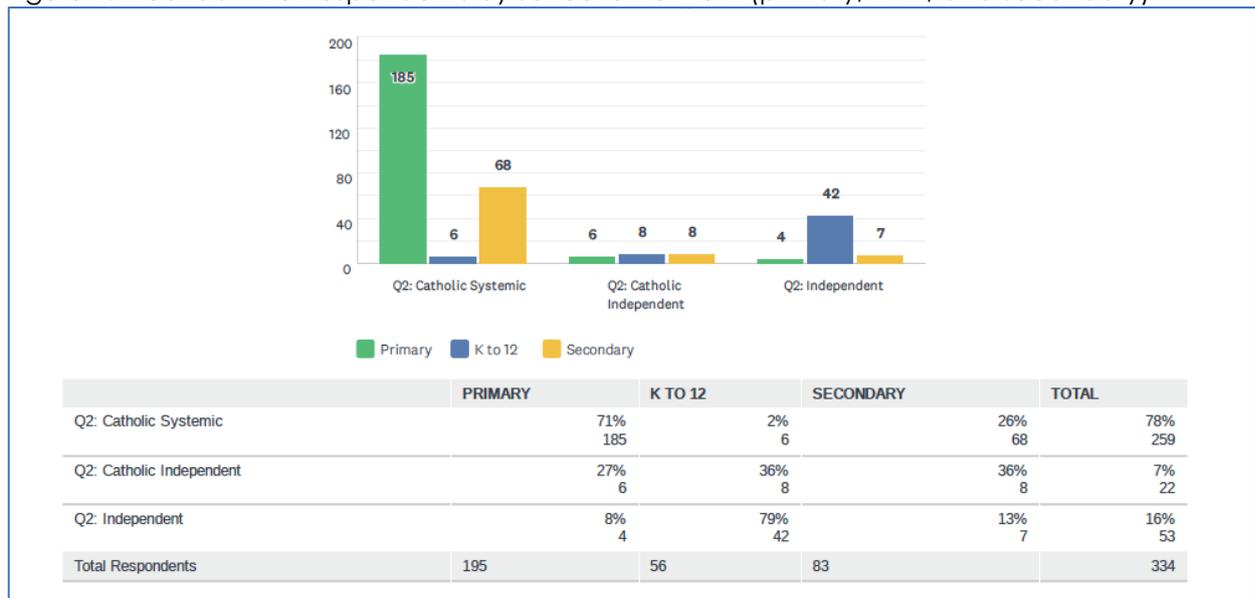


Figure 2: Breakdown of respondents by geography (Sydney Metro, NSW Regional, ACT)

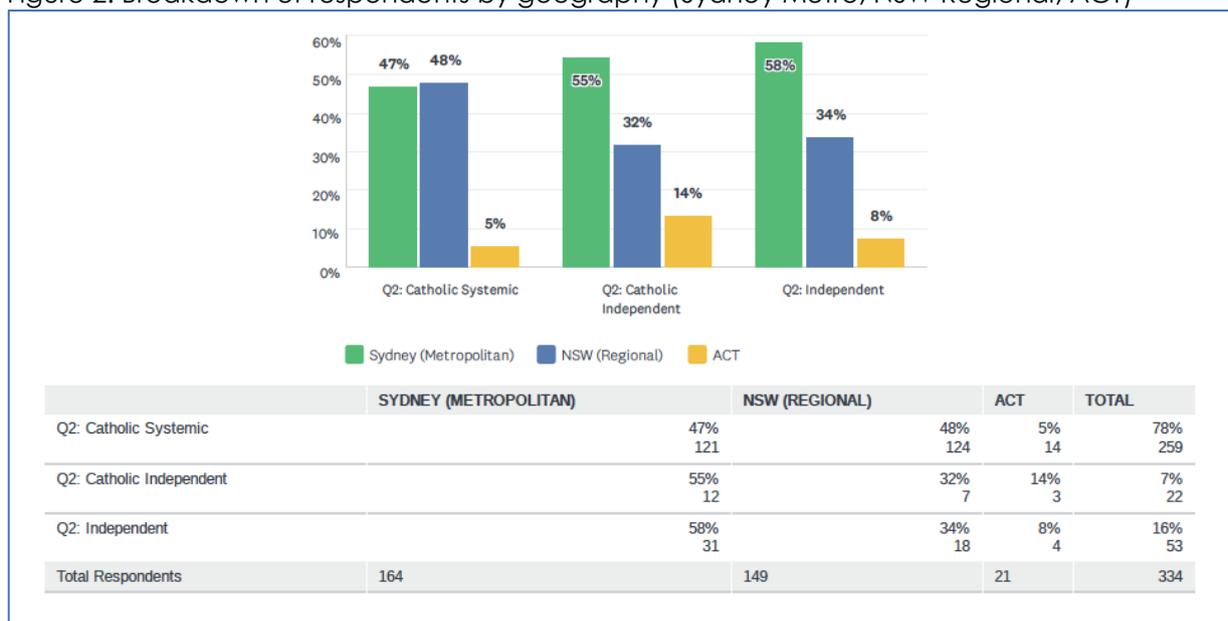


Figure 3: Breakdown of respondents by school enrolment numbers



3.0 Survey findings

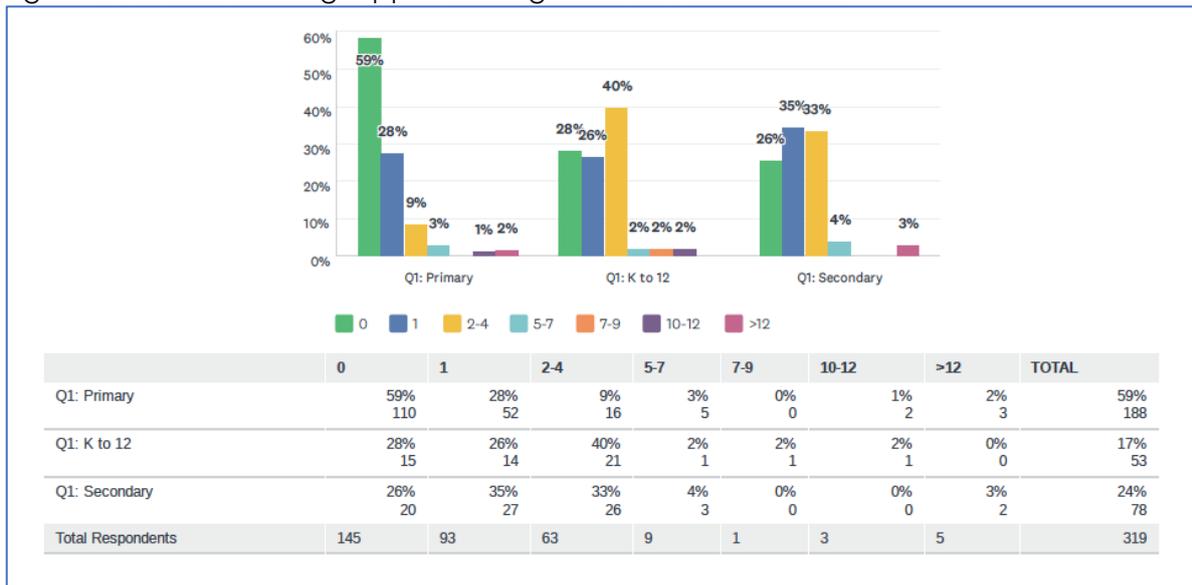
3.1 Who is responsible for this work in schools?

It appears that the NCCD workload falls substantially on the shoulders of a part-time work force. In the majority of schools this is the responsibility of a single teacher.

- 3.1.1 59% of primary schools reported that there were no full-time staff working in learning support at their school.

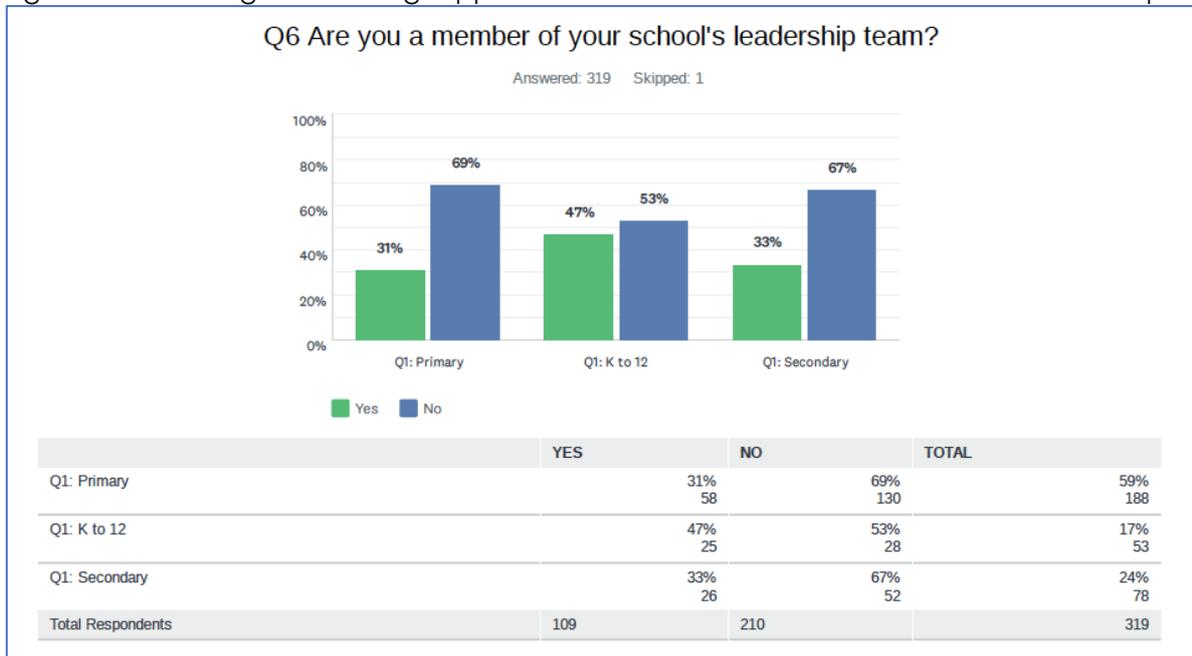
- 3.1.2 75% of all respondents indicated that they either have no full-time staff, or only one full-time staff member, working in learning support at their school.

Figure 4: Full-time learning support staffing numbers within schools



- 3.1.3 While 83% of respondents indicated their role at the school was a learning support coordinator, only one third of the staff most responsible for directing the NCCD process were members of the school leadership team.
- 3.1.4 Learning support representation on school leadership teams was noticeably higher in the independent school sector as compared to Catholic systemic or Catholic independent schools.

Figure 5: Percentage of learning support staff who are members of their school leadership team

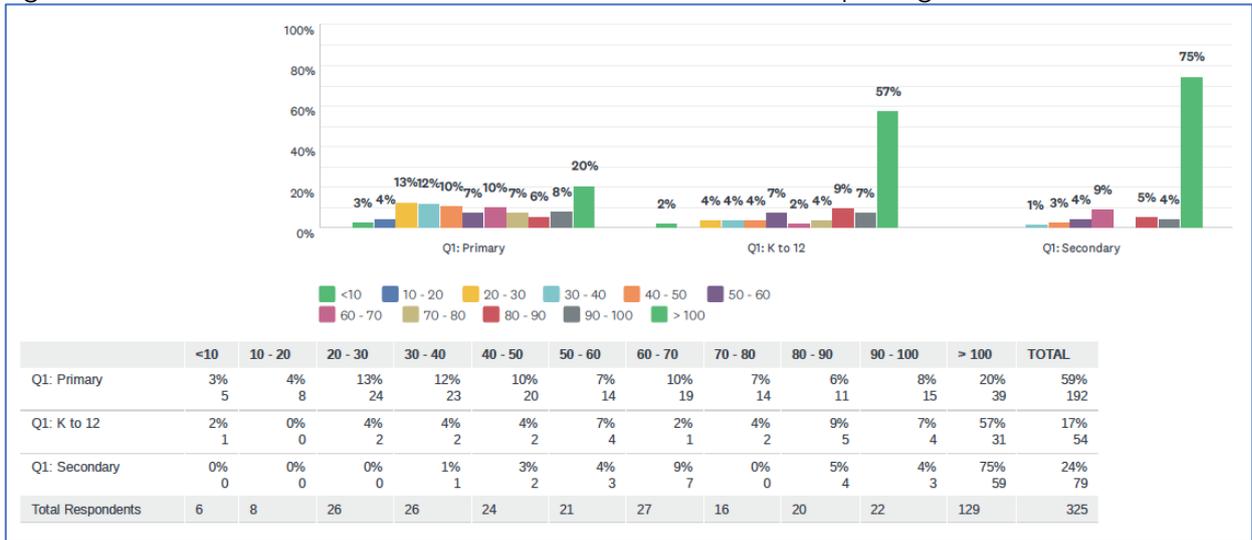


3.2 What does the NCCD student cohort look like in non-government schools?

The majority of schools participating in this survey collect NCCD evidence for significant numbers of students. 97% of secondary schools submitted data on 50 students with three quarters of these schools reporting on more than 100 students in 2020.

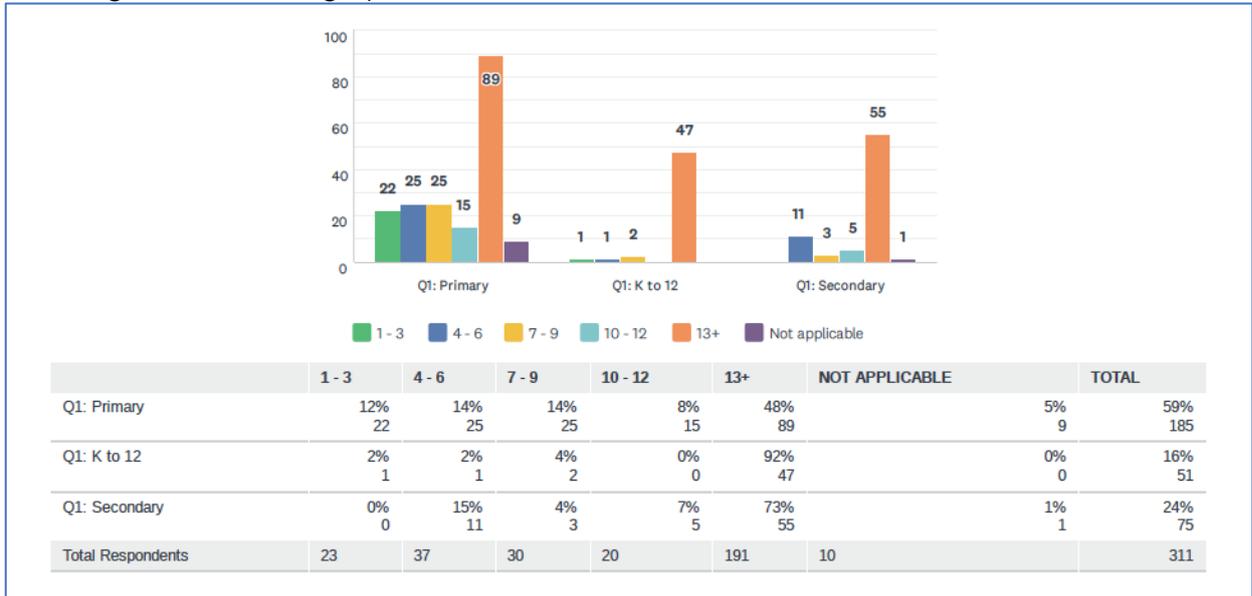
- 3.2.1 59% of primary schools indicated they were responsible for reporting on more than 50 students in their annual NCCD submission and one fifth were reporting on 100 students or more.
- 3.2.2 75% of secondary schools indicated they were responsible for reporting on more than 100 students in their annual NCCD submission.

Figure 6: Total number of NCCD students on which schools are reporting



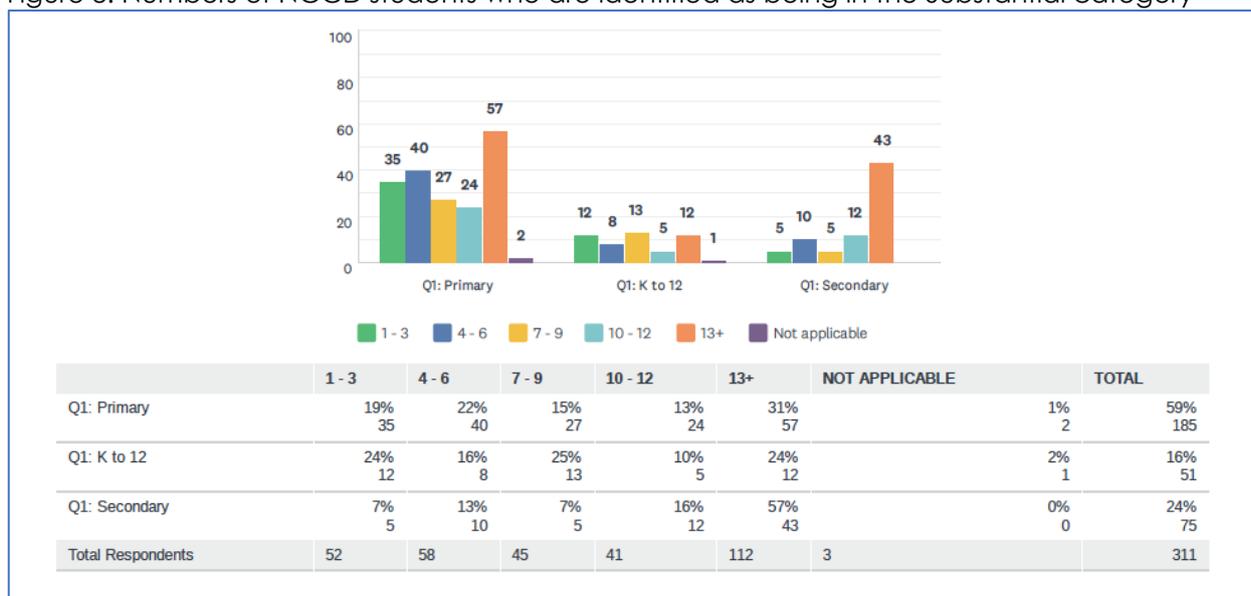
- 3.2.3 The majority of Catholic systemic and Catholic independent schools, and virtually all of the independent schools, are reporting on 13 or more students categorised as requiring Quality Differentiated Teaching Practice (QDTP)

Figure 7: Numbers of NCCD students who are identified as being in the Quality Differentiated Teaching Practices category



- 3.2.4 89% of all schools indicated they had 13 or more students classified in the Supplementary NCCD category.
- 3.2.5 31% of primary, 24% of K-12, and 57% of secondary schools indicated they had 13 or more students in the Substantial NCCD category.
- 3.2.6 41% of primary, 32% of K-12, and 17% of secondary schools indicated they had no students classified in the Extensive NCCD category.

Figure 8: Numbers of NCCD students who are identified as being in the Substantial category



3.3 What impact does the NCCD process have on workloads?

The overwhelming majority of respondents indicated that they spend significant amounts of out of school hours, in addition to their daily preparation and planning, in order to fulfill the NCCD obligations.

- 3.3.1 54% of respondents reported that they do not receive any additional release time to complete the NCCD process.
- 3.3.2 47% of all respondents reported spending in excess of five hours out of school hours per week completing the administrative tasks associated with the NCCD process.
- 3.3.3 Concerns surrounding inadequacy of allocated release time were also highlighted in the qualitative data.

"The amount of administrative time required to collect and maintain evidence is blowing out. The two terms prior to NCCD submission require intense periods of out of school time... to ensure that it is completed accurately."

"It is not just the application process of adding a student to NCCD that is time consuming, it is the monitoring and reviewing of the adjustments, constantly adding parent conversation details to the NCCD plans, adding new reports and new assessments to our evidence."

"The NCCD doubles our workload without a doubt. We need to be given adequate time to be able to complete the job....We are working countless hours at home to be able to maintain our in class support (four hours per day) while using the last remaining hour of our work days to complete all necessary paperwork for the NCCD."

"During Term 2, I would spend an average of five hours each night as well as six hours each day of the weekend entering and checking data."

3.4 What impact does the NCCD process have on the core work of learning support staff?

Respondents consistently raised concerns about the impact of the NCCD process on their ability to support students with special needs and their teachers.

- 3.4.1 Data collection and administration of the NCCD process was ranked first by 42% of all respondents as consuming the majority of their professional

time in the previous six months, with 60% of survey participants ranking NCCD administration as either first or second.

Figure 9: Professional activities ranked by teachers in order of the amount of time they consume



3.4.2 The detrimental impact of the administrative requirements of the NCCD process were also reflected in the comments.

"The allocation of time currently does not allow me to perform my required duties and assist teachers through the NCCD/PPSD process."

"The most challenging part was to complete the NCCD process and yet at the same time actually do my job which is supporting the students at the school as well as the staff. It felt like most of Term 2 was taken up gathering all the data and trying to prove that we have provided the satisfactory evidence for all the students."

"My time to actually support students and teachers has dramatically decreased. Writing plans and ensuring evidence and monitoring now takes up 90-95% of my full-time role. I am a very expensive and over-educated data enterer!"

"The NCCD has significant impact on my part-time learning support teachers who also teach mainstream classes (3-4 classes as part of their load) making the role of a learning support teacher challenging. There is often little time left to actually support the students."

3.5 The evidence management team and the audit process

3.5.1 57% of respondents reported the existence of an evidence management team at their school, as recommended by the NCCD.

3.5.2 62% agree or strongly agreed that the evidence team managed the process effectively. However, many comments acknowledged that it was a demanding and time-consuming process that was difficult to sustain as a team.

"The team effort took a few years to implement and the process is still evolving."

"The school manages the process as effectively as it can, however, it is a huge workload for both classroom teachers and learning support teachers."

"Time doesn't allow for the team as such to manage the process effectively so in the end it still comes down to the Learning Support Coordinator."

3.5.3 Schools which had been through an audit reported significant concerns about the efficacy and usefulness of the process. The comments indicated onerous expectations.

"It took 13 weeks of a full-time LST and 3day/week LSO to get all the data ready for the auditors. It's not that schools don't already have the evidence required but the organisation and collation of that data that is onerous."

"We were prepared yet it still required many additional hours organising evidence in a way that would be accessible to an auditor."

3.6 Professional development (PD) issues and implications

3.6.1 Advice was often conflicting or changed regularly, causing confusion.

"The difficulty with PD is the goalposts of the NCCD keep moving, so rather than deepening learning it is often going over the information for changes. The system overseeing the systemic schools do not seem to have a sequential process and things can change right in the middle of the procedure."

"This PD is incorporated into our quarterly Learning Support Days. This professional development can be helpful, however the information we are given changes and at times it feels like not everyone is on the same page with the expectations of NCCD."

"Expectations regarding the gathering of data for NCCD appear to change regularly – this causes confusion."

3.6.2 Professional development is often unrealistic and/or repetitive.

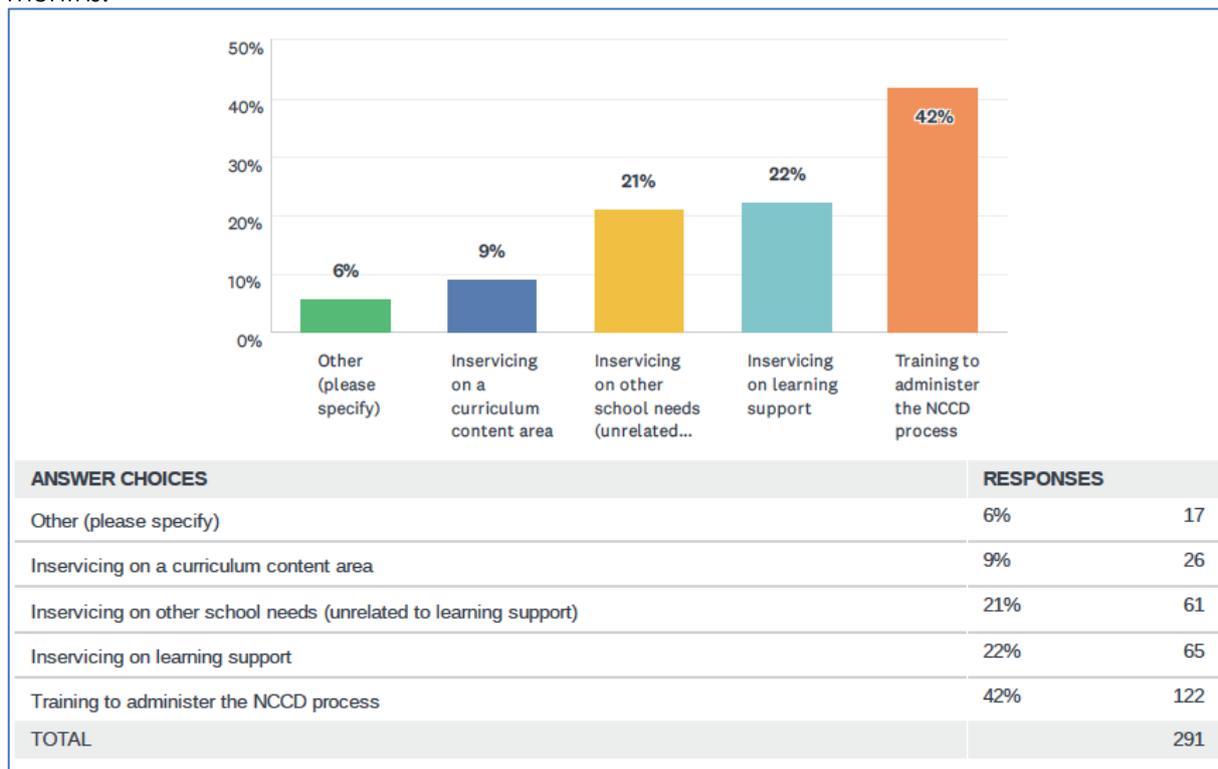
"Often the training goes over and over the same things taking time away from actually working on the applications."

"The NCCD training is good and very thorough, however, the data collected in their models is not achievable in a busy school with a teaching role to carry also. A more achievable model would be appreciated by the participants in the courses."

"The focus on best practice rather than mandated minimum requirements in some PD means schools lose the capacity to make key decisions that would allow them to better manage the workload."

Respondents reported that the majority of their PD time was spend on NCCD training at the expense of PD supporting their core professional roles.

Figure 10: Breakdown of the PD areas undertaken by learning support staff in the previous six months.



3.6.3 Professional development obligations potentially created additional work for learning support staff.

"Most of the professional development provided at my school is provided by me to other staff. It is exhausting. Not much PD is provided to me."

"Professional development of staff in our school is another addition to our role, as we have to prepare staff meetings to explain the NCCD to teachers and what is expected of them."

3.6.4 Support from the various systems was generally forthcoming and welcomed.

"Our system provided professional development and provided power points that could then be used with staff which was extremely helpful."

"We have had some fantastic cross-sectoral discussions, training and moderation – with Catholic Independent schools and departmental schools – these are the most valuable."

"Leaders of Learning from the region were proactive in providing professional development around the NCCD. There was ongoing support through zoom meetings and phone calls to discuss the school's data and moderation process."

3.7 Online data collection platform issues and duplication of data entry

3.7.1 There was general criticism of the various platforms used in the NCCD process, especially with respect to managing high volumes at peak times. There was limited confidence in the reliability and stability of the platforms, regardless of which platform was in use.

3.7.2 The system was unreliable, especially during peak periods.

"The frustration with using IT at peak times was unbelievable. The system just couldn't cope at peak times. I would have students disappear from the page

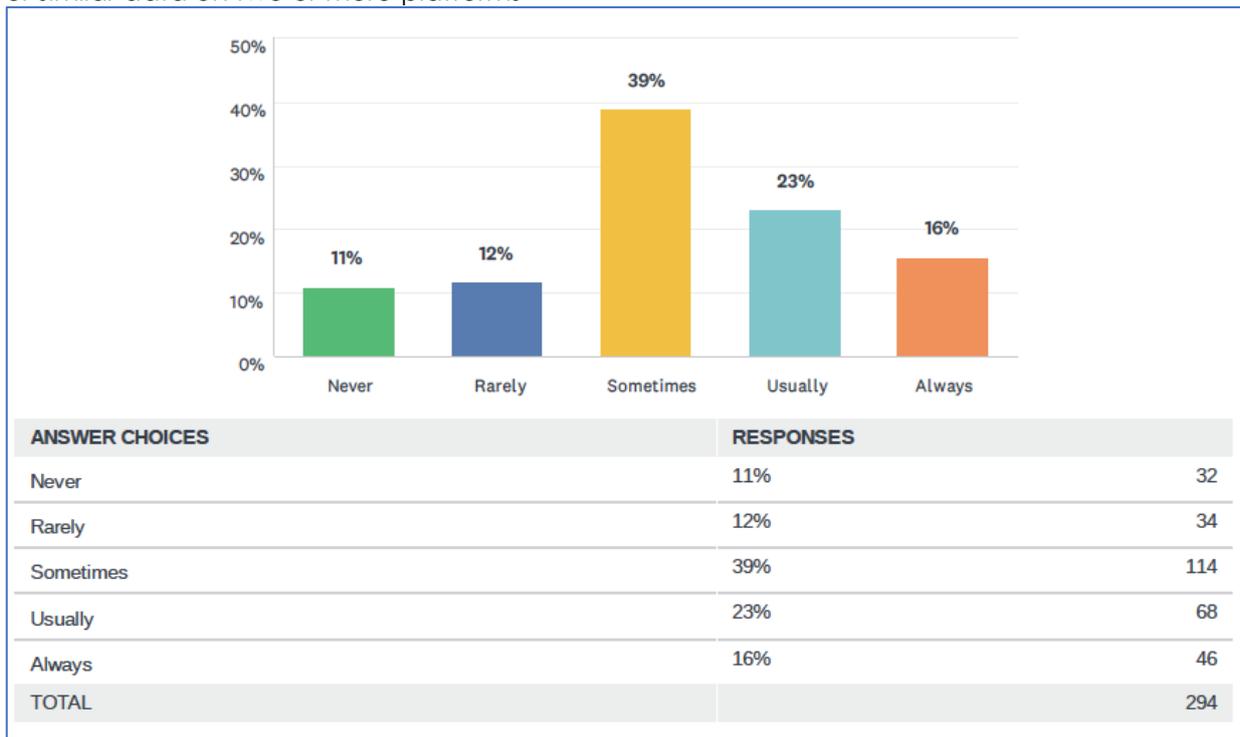
(including Substantial, Extensive that I was needing to work on) this was still at very late at night and early in the morning.”

“During the lead up to the census, the IT system is slow. During NCCD collaborative meetings, only one person can access a student at one time, slowing the process of administration. The same data cannot be added to multiple students, again slowing up the admin process.”

“The platform can definitely not cope with the high volume of users during the busy periods at the end of the cycle. Furthermore, there are often times when two staff members cannot view and manage data on the same student simultaneously. At times there is a problem with updated data being saved.”

3.7.3 78% of all respondents reported they were sometimes, usually, or always required to submit the same or similar data on multiple platforms.

Figure 11: Percentage of all respondents who indicated they were required to submit the same or similar data on two or more platforms



3.7.4 Qualitative data responses also revealed issues with duplication of data for multiple education purposes or for uploading on multiple platforms.

“The workload is too heavy for completion of plans that duplicate information that may be recorded elsewhere. The time spent on collecting evidence is equal to the time spent preparing plans.”

“All educational data entered on a PP is also entered somewhere else ie Faces Learning Data, Student Information Systems, Reditech, data walls. Minutes of meetings are required to be kept as well as a brief description of the meeting in the PP.”

“Every piece of data/report is duplicated and doubled up. All results from formative assessments are kept on a Whole School Data Base. This data then needs to be duplicated into the NCCD 'Curriculum' page. Information kept on Compass needs to then be duplicated into the NCCD portal. Information is doubled up on 'One Page Sign Off Sheets' that parents need to be signed.”

“Parent meetings on Compass and also NCCD. Data on students on NCCD and school databases. Goals and adjustments on PLPs, in teacher programs and on NCCD – Constant duplication of information.”

3.8 Final comments from respondents

Participants were invited to submit any final comments or observations regarding the NCCD process. A number of themes emerged in these comments.

3.8.1 The NCCD process has become inordinately time-consuming and complex.

"I feel the whole process of the NCCD is very time-consuming and cumbersome. The irony is that the time spent on entering data into the NCCD is time that should be spent working with the students that we are submitting information about. It seems that the role of a learning support teacher has become more of an administrative role, instead of a support for teachers and students."

"Over time, the NCCD process, as it becomes more complex and evidence-based, is taking away from what it actually is supposed to be doing – and that is providing equity for all students. I spend too much time on paperwork and administrative tasks, meaning there is less time for resource preparation."

"Over the last five years, the NCCD data collection has become more and more onerous. At the end of the day, we are given time out of class to ensure that the PP's are filled in when the priority should be for us to be in class or working with teachers in order to support and enhance learning outcomes for all students! You either complete the paperwork or work with the students and teachers. There is not enough time in a school day to do both adequately."

3.8.2 The NCCD process has become unmanageable and is unsustainable.

"The process is incredibly time-consuming, and a significant amount of fear exists within our colleagues around not getting it right which has had a huge impact on the mental health and wellbeing of teachers. In the NCCD process, all teachers, and particularly the Coordinators at the school, are being asked to do more and more work without an appropriate time allowance."

"The upkeep of the NCCD process is a `full-time job in any school, all year long! "

"The process needs to be refined if it is to continue. The database is lengthy and often repetitive. Too much doubling up of information, too much time wasted trying to collect data."

"Once again, an additional administrative burden has been placed on schools and staff to have this data collected in a new format (NCCD) which we are told is vital, yet corresponding release hours have not been given to individual teachers, learning support nor the NCCD teams to do this well. It is impossible to keep adding to the volume of a day without giving us more hours to do the work in."

3.8.3 There remains a need to develop a whole school understanding of the NCCD process.

"ALL staff need to be professionally developed on a system level so that they are fully aware of their responsibilities, obligations and requirements to provide adjustments. They need to understand the importance of consultation, planning, implementation and monitoring of adjustments and the recording of this for evidence in programs and other areas."

"The school has had ongoing professional development, however, that does not mean they fully understand it. There is still a perception that Learning Support is the responsibility of the LST when it is also the responsibility of the class teacher."

3.8.4 Adjustments plans in some sectors adds to the workload. Comments indicated doubling up in processes and school-wide documentation for teaching and learning.

"The latest changes are that every teacher program needs to show adjustments for all students on the PP tool even though these adjustments are already written on the PP Tool eg 'repeat instructions to student'. LSOs also need to record who they work with and what they did with these students even though timetabling shows this. This takes time out of their supporting the students."

"The information gathered in the NCCD report for each student becomes a cumbersome document which teachers have no time to navigate. This is then duplicated as a Learner Profile to sit on Compass for easier accessibility to teachers."

4.0 Conclusions and analysis

- 4.1 It is clear that the NCCD process has profound workload ramifications for learning support staff. IEU members assert that the process has grown to the point where it is both unmanageable and unsustainable.
- 4.2 Survey results indicate the need for a more appropriate consideration and understanding of the workload impact the NCCD process has on learning support staff at the school level. It is critical to ensure learning support teachers are not diverted from their core work of supporting students with special needs and the classroom teachers who work with these students. Any proposed changes to the process should also take into consideration the likely impact on classroom teacher workload.
- 4.3 IEU members clearly appreciate the need for an effective, nationally consistent process for the collection of data on students with disabilities. Unfortunately, it is demonstrable that the current approach, using multiple platforms and differing expectations from schools or systems of schools, hinders consistency. Inconsistencies, uncertainty about requirements, and inadequate support create additional workloads and cause frustration and stress.
- 4.4 The NCCD process obligates schools to provide the same evidentiary requirements for QDTP students even though they do not attract funding. This exacerbates the workload issues, given the significant numbers of QDTP students in schools.
- 4.5 Due to the funding implications, collection of NCCD data is a high-stake undertaking. Part-time staff who carry the majority of the burden struggle to carry out their core duties in addition to the administrative requirements of the NCCD.
- 4.6 Learning support teachers wish to engage with meaningful professional development. Appreciation for courses tailored to the NCCD is apparent, but clearly consumes a disproportionate amount of the time available for training in other professional areas specific to learning support.
- 4.7 Significant frustration for learning support teachers appears to be the requirement to duplicate data across a variety of platforms and for a range of other administrative purposes. Some comments indicated that there may be school or system-specific issues related to personalised learning plans.
- 4.8 It is notable that respondents raised concerns about the digital platforms, regardless of which platform they were required to use. Areas of frustration included untimely version upgrades, system instability, and system crashes, especially during peak periods.

5.0 Prospective areas for change/recommendations

Based on the results from the survey, the IEU recommends the following:

- 5.1 Measures should be taken to staff the NCCD process appropriately at the school level.
 - 5.1.1 Staffing ratios need to be sufficient to allow the core role of learning support to take place.
 - 5.1.2 Release time should take into account the workload impact of the NCCD process, in addition to regular programming and assessment responsibilities.
- 5.2 Exemplars to be provided and published on the NCCD website to provide clarity around the evidence template requirements and avoid layering of expectations.
- 5.3 Schools and systems to review documentation and processes to ensure that they are not exceeding the requirements of the NCCD.
 - 5.3.1 The school's information or learning management system would ordinarily contain the necessary student information for the NCCD, and other purposes, for both classroom teachers and learning support staff. Any requirements to provide additional documentation, eg personalised planning tools, are superfluous and contribute to unnecessary workloads.
- 5.4 Eliminate or substantially reduce the requirements associated with external reporting on students in the quality differentiated teaching practice (QDTP) category.
- 5.5 Evidentiary requirements should be streamlined across all categories. In particular, the annual and recurring evidentiary requirements for students likely to remain in the in the NCCD Extensive category should be subject to review.
- 5.6 Refine the evidence management process and improve the efficiency of the digital platform in order to reduce the need for ongoing and extensive PD related to the NCCD. This should allow learning support staff to concentrate on PD that relates to their core role of supporting students with disability.
- 5.7 Ensure that any necessary system or version upgrades to the digital platform are minimal and are enacted prior to the point when users will be expected to engage with the platform. The capacity to allow the bulk uploading of data should be facilitated.

6.0 Suggested next steps

- 6.1 Federal Executive and Branch IEU Executives to:
 - 6.1.1 Consider options to administer a refined version of the survey across all states
 - 6.1.2 Consider follow up survey options in NSW, with a view to tracking developments in the NCCD process over time.
- 6.2 Federal Secretary to discuss survey findings with DESE and other relevant Federal bodies.
- 6.3 NSW Branch Secretary to discuss survey findings with relevant state bodies and employers.

End of report

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