



20 August 2019

Mr Michael Chaney AO
Chair
National School Resourcing Board

**National Catholic Education Commission
Submission to the National School Resourcing Board
Review of the loading for students with disability**

Thank you for the opportunity to provide input into the National School Resourcing Board (NSRB) review of the loading for students with disability (the review).

The National Catholic Education Commission (NCEC) is the representative body of Australia's Catholic schools. Working closely with the state and territory Catholic education commissions, the NCEC advocates for and influences policy at the national level on behalf of Australia's Catholic schools.

Australia's Catholic schools are diverse and universal in their reach, offering an education to all. Increasing numbers of students with disability are educated in Australia's Catholic schools. Currently almost 140,000 students with disability are enrolled in Catholic schools. This equates to approximately 18% of all Catholic school students. The NCEC's expectation is that if past enrolment trends continue, increasing numbers of students with disability will be enrolled in our schools.

The NCEC seeks to work constructively with the NSRB. We have reviewed the consultation paper for the review and make the following comments. These comments supplement any submissions by state and territory Catholic Education Commissions lodged with the NSRB. As the NSRB is aware, these commissions individually perform the role of approved system authorities through which most Catholic schools are funded and operated in accordance with the *Australian Education Act 2013* (the Act).

General comments

1. The Schooling Resource Standard (the SRS) purports to be an estimate of the public funding a school needs to meet the educational needs of its students. The SRS is comprised of the base amount and the six loadings for students who need extra support including students with disability.
2. Australia's Catholic schools value inclusion, welcome students with disability and make reasonable adjustments to ensure that they can access and participate in education on the same basis as other students. Adjustments by Australia's Catholic schools are made not only

in compliance with the *Disability Discrimination Act* (1992) (the DDA) but also as part of their mission to offer an education built on a Catholic understanding of the human person.

3. The NCEC agrees in principle with a school funding formula that includes a component for both base and loadings however the current structure of the model suffers from major shortcomings which can and should be overcome. In this regard we refer the NSRB to the NCEC submission to the review of the needs-based funding requirements for approved system authorities dated 28 June 2019 (copy attached).
4. Under an assumption that non-government schools can raise fees to contribute to base funding, the SRS is only partially funded for non-government schools. This means that except for special and special assistance schools, majority Indigenous schools and sole provider schools, the public funding that any student in a non-government school attracts is always less than the funding an identical student attracts in a government school. This key assumption holds regardless of individual student characteristics including whether a student is a student with disability.
5. All students with disability should be funded on the same basis, regardless of the education sector.
6. The NCEC believes that the focus of this review on the loadings for students with disability to the exclusion of other loadings provided under the Act is problematic.
7. The interaction between the loadings provided under the Act and the base funding amount are significant and the NCEC believes this should inform school funding discussions and reviews.
8. To illustrate the point, the NCEC notes that in the case of students identified by the Nationally Consistent Collection of Data on School Students with Disability (NCCD), some will attract significant additional loadings, and some will attract no other loading. An assessment of the adequacy of the funding (loading) that a student with disability receives, should involve a consideration of all the loadings and the base funding amount allocated.
9. The NSRB should approach its work holistically and review not just the students with disability loadings but all the funding and loadings provided under the Act.

Focus questions

10. The NCEC expects that state and territory Catholic education commissions are best placed to provide detailed responses to the focus questions in the consultation paper. The NCEC offers the following general comments.

Question one

11. The evidence base for determining the loading for students with disability was insufficient. The loadings (and their construction) was largely a political exercise rather than one informed by evidence. Catholic education has expressed reservations with the calculations and data underlying the loadings both at the development and implementation stage.
12. The application of the socio-educational disadvantage loading is another illustration of this point. Half of all students enrolled in Australian schools attract this loading without, in the NCEC's view, proper consideration.

13. Given the lack of rigour applied to the original design, the NCEC agrees that an assessment is required of the adequacy and effectiveness of the distribution of the loading for students with disability across the supplementary, substantial and extensive categories.
14. The NCEC recommends that the NSRB approach this assessment with reference to the school context and the cost of resourcing for adjustments for students with disability. For example:
 - a. Small schools in remote areas have limited access to onsite services and staff and may incur a higher cost of sourcing these outside the school.
 - b. Economies of scale mean that a school with a higher percentage of students with disability in its student population (for example in a special-school or a secondary school) will be able to make adjustments for a lower per-student cost.
 - c. The administrative cost of the NCCD including in professional development, staff time and data collection should be costed and included in the loadings.

The NCEC recommends that the NSRB conduct a robust study based on a fully representative sample of schools.

15. A major strength of the Australian school environment is its diversity. Schools are geographically dispersed, socially diverse, multicultural and multi-faith. A priority for the NCEC is the recognition of the autonomy that Catholic education authorities have over the final distribution of funds to schools. State and territory education commissions are best placed to make decisions for their own context. The NCEC acknowledges that this approach is consistent with the policy intent of the SRS, the Act and is based upon school systems' knowledge of their schools and local communities and established approaches to needs-based funding.
16. It is the NCEC's strong belief that local knowledge of context is crucial to establishing the level of funding required to meet the needs of all students including students with disabilities.
17. Any recommendation by the NSRB that might result in a prescriptive approach to the distribution of loadings at the school level would be contrary to current policy and is not supported by the NCEC.

Question two

18. Feedback from Catholic education is that the Australian Government's Assurance (QA) processes are cumbersome and are placing significant pressure on our schools.
19. During the consultation that preceded introducing the NCCD as the basis for the student with disability loading, the NCEC raised concerns about the likely impacts on teachers and schools. These impacts have been realised and they include:
 - a. significant additional administrative processes at the local school level;
 - b. additional time and staffing costs associated with the administration of NCCD; and
 - c. the retention of a greater volume of data on students included in the NCCD count and associated data storage costs.

The burden imposed by the accountability and assurance processes are not factored into the loadings.
20. It is the NCEC's view that the evidence for teacher judgment to support inclusion in the NCCD does not generate any additional educational benefit for students. It takes the attention of teachers away from classroom teaching and learning, professional development and school

leadership; the components of professional practice widely recognised as being critical to achieving better outcomes for students.

21. The increased cost imposed on schools is also an issue at the system authority level. An already extensive regime of accountability requirements, including the requirements of states and territories, apply to Australia's Catholic schools. Additional demands to account for decisions about adjustments has resource implications for schools and systems.
22. Inconsistency and strength in assurance processes is something that the NCEC looks forward to the NSRB considering. The NCEC supports the recommendations of the Australian National Audit Office in relation to the compliance and accountability arrangements of the Department of Education and Training.
23. The NCEC is informed that differing approaches adopted to aid the assurance process is confusing for schools. Catholic education has noted significant differences in the post enumeration audits undertaken by contractors engaged by data and census branch and the quality assurance validation undertaken by PwC.
24. For example, the NCEC is informed that PwC approach the validation process by using a 100-point scale to determine breadth and depth of evidence for the four areas, whereas the post enumeration census auditors require one piece of evidence for each of the same four areas.
25. Furthermore, the NCEC believes the QA processes could be improved by transparent and timely notification of what each process will be assessing compliance against and consistency of approach across all schools, rather than variable requests for evidence in particular formats.

Additional Comments

National Disability Insurance Scheme (NDIS)

26. It is noted that the Australian Government Department of Social Services is undertaking work into the delivery of personal care and specialised school transport to and from school through the NDIS. The NCEC awaits the outcome of this work and would support recommendations that distinguish between adjustments incurred within an NDIS package and NCCD adjustments.

The Joint Working Group to Provide Advice on Reform for Students with Disability (JWG)

27. The NCEC endorses the NSRB acknowledgement of the work of the JWG. The NCEC is represented on the JWG and has found it to be an essential vehicle to build a consistent understanding and application of the NCCD. The JWG has been the only vehicle for the jurisdictions to share information, clarify understanding and obtain and offer guidance in relation to the NCCD. The NCCD data quality is building as a result of this collaboration. The NCEC understands that the JWG will be disbanded at the end of 2019 with a recommendation presented for consideration to the AESOC meeting on 30 August 2019. The NCEC seeks the support of the NSRB to ensuring that the work of the JWG continue.

Please contact the NCEC on the details overleaf should you wish to discuss this submission.



National Catholic Education Commission contact details

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